

## **Worley, Jordan P**

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**From:** Linda Lau <lindalau@globallawgroup.net>  
**Sent:** Tuesday, November 14, 2017 5:49 PM  
**To:** USCIS Immigrant Investor Program  
**Cc:** Kay Wang; Suki Liao  
**Subject:** Request to Update Attorney Address Record  
**Attachments:** Track your package or shipment with FedEx Tracking.pdf

**November 14 , 2017**

**Via Email to USCIS.ImmigrantInvestorProgram@uscis.dhs.gov and**  
**By FedEx (Tracking No.: 7705 7722 4286)**

**RE: Attorney Change of Address**

Dear Sir or Madam:

Our office is the attorney of record for the petitioners listed below. Our Form G-28 is on file with USCIS.

As our office has moved, on November 9, 2017, we submitted a batch with a total of 14 Requests for Attorney Address Change with updated form G-28 with our new address: **968 South Fair Oaks Avenue, Suite 100, Pasadena, CA 91105** to USCIS via FedEx (Tracking number: 7705 7722 4286) and the tracking status showed the package was delivered on November 13, 2017. Enclosed Please find the tracking status for your reference and please kindly confirm the below shipping address.

U.S. Citizenship and Immigration Services  
Immigrant Investor Program Office  
131 M Street, NE  
Mailstop 2235  
Washington, DC 20529

Below is the information of Petitioners of this batch, we would appreciate that USCIS records be updated to reflect our new address.

Please do not hesitate to contact me at [lindalau@globallawgroup.net](mailto:lindalau@globallawgroup.net) or at (213) 830-9933 should you have any questions. Thank you.

Number	Form Type	Receipt Number	Application/Petitioner's Name
1	I-924	RCW1625654407	Vegas Regional Center LLC
2	I-924	RCW1525952930	American Everglow Regional Center LLC
3	I-924	RCW1624554399	Nevada Regional Center Etnterprises
4	I-924	RCW1527153049	American Everglow Regional Center LLC

5	I-924	RCW1711755514	YK America Regional Center LLC
6	I-924 Exemplar	RCW1627454437	Century American Regional Center LLC
7	I-924 Exemplar	RCW1633554575	Urban Commons Global LLC
8	I-924	RCW1527153047	Mebo Property Development RC
9	I-924	RCW1534853626	Bright Green RC LLC
10	I-924	RCW1636255051	American Greenland Regional Center
11	I-924	RCW1527553326	Beresford Regional Center
12	I-924	RCW1635855002	West Maingate Regional Center LLC
13	I-829 Notice to Intent to Deny	(b)(6)	
14	I-829 Notice to Intent to Deny	(b)(6)	

(b)(6)

Sincerely,

Linda Lau, Esq.

Global Law Group  
968 S. Fair Oaks Ave., Suite 100  
Pasadena, CA 91105  
Tel : (213) 830-9933  
Fax : (213) 830-9930  
E-mail : [lindalau@globallawgroup.net](mailto:lindalau@globallawgroup.net)  
Website: [www.GlobalLawGroup.net](http://www.GlobalLawGroup.net)

This e-mail and any attachments may be confidential and may be protected by the attorney-client privilege, work product doctrine, or other nondisclosure protection. If you believe that it has been sent to you in error, you may not read, disclose, print, copy store or disseminate the e-mail or any attachments or the information in them. Please reply to the sender that you have received the message in error. Then delete it. Thank you.

As of November 1, 2017, Global Law Group will be operating from its new office at  
968 South Fair Oaks Ave., Suite 100, Pasadena, CA 91105.

Kindly update your records and please note that mail correspondence is being received at the new address effective immediately.

自 2017 年 11 月 1 日， 美国基宝律师事务所将迁至如下新地址：

968 South Fair Oaks Ave., Suite 100, Pasadena, CA 91105.

敬请更新您的通讯记录，即日起所有邮件通讯请使用上述新地址

## **Worley, Jordan P**

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**From:** USCIS Immigrant Investor Program  
**Sent:** Thursday, May 11, 2017 7:26 AM  
**To:** Linda Lau  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527153015)

Dear Linda Lau,

Please allow at least 30 days for processing.

Thank you for your patience.

Regards,

Immigrant Investor Program Office  
U.S. Citizenship and Immigration Services  
MS0017

---

**From:** Linda Lau [mailto:[lindalau@globallawgroup.net](mailto:lindalau@globallawgroup.net)]  
**Sent:** Friday, May 05, 2017 1:27 PM  
**To:** USCIS Immigrant Investor Program  
**Cc:** Kelly Shu; Helyn Lau; Kay Zhu; Julie Yue  
**Subject:** Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527153015)

**RE:** Confirmation of the Withdrawal of Form I-924 Amendment Application  
**Regional Center Name:** American Everglow Regional Center, LLC  
**New Commercial Enterprise:** Bloomage Villa Fund, LP  
**Receipt No.:** RCW1527153015

Dear Sir or Madam,

Our office is the attorney of record in the above-referenced matter (RCW1527153015), and our G-28 is on file with the USCIS.

A Notice of Intent to Deny was issued by USCIS on April 3, 2017 with the due date of May 6, 2017. In response, we sent a withdrawal request of the above-referenced matter (RCW1527153015) to USCIS on May 2, 2017 (FedEx tracking number: 778934637665), and it was received by USCIS on May 3, 2017. Please find the attachments for the copy of the withdrawal package and the screenshot for the proof of FedEx delivery.

Please confirm that the Form I-924 Amendment Application (RCW1527153015) has been withdrawn.

Thank you for your kind assistance.

Best regards,

Linda Lau, Esq.

Global Law Group  
US Office:  
600 S. Lake Avenue, Suite 306  
Pasadena, CA 91106  
Tel: 1 (213) 830-9933  
[www.GlobalLawGroup.net](http://www.GlobalLawGroup.net)

Shanghai Representative Office:  
7/F, Building E, 753 Yu Yuan Road, Changning District,  
Shanghai, China 200050  
Tel : (86) 21-6278 0866

## **Worley, Jordan P**

---

**From:** Linda Lau <lindalau@globallawgroup.net>  
**Sent:** Friday, May 05, 2017 12:27 PM  
**To:** USCIS Immigrant Investor Program  
**Cc:** Kelly Shu; Helyn Lau; Kay Zhu; Julie Yue  
**Subject:** Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527153015)  
**Attachments:** Withdrawal Package to USCIS.pdf; FedEx Delivery Confirmation.pdf

**RE:** Confirmation of the Withdrawal of Form I-924 Amendment Application  
**Regional Center Name:** American Everglow Regional Center, LLC  
**New Commercial Enterprise:** Bloomage Villa Fund, LP  
**Receipt No.:** RCW1527153015

Dear Sir or Madam,

Our office is the attorney of record in the above-referenced matter (RCW1527153015), and our G-28 is on file with the USCIS.

A Notice of Intent to Deny was issued by USCIS on April 3, 2017 with the due date of May 6, 2017. In response, we sent a withdrawal request of the above-referenced matter (RCW1527153015) to USCIS on May 2, 2017 (FedEx tracking number: 778934637665), and it was received by USCIS on May 3, 2017. Please find the attachments for the copy of the withdrawal package and the screenshot for the proof of FedEx delivery.

Please confirm that the Form I-924 Amendment Application (RCW1527153015) has been withdrawn.

Thank you for your kind assistance.

Best regards,

Linda Lau, Esq.

Global Law Group  
US Office:  
600 S. Lake Avenue, Suite 306  
Pasadena, CA 91106  
Tel: 1 (213) 830-9933  
www.GlobalLawGroup.net

Shanghai Representative Office:  
7/F, Building E, 753 Yu Yuan Road, Changning District,  
Shanghai, China 200050  
Tel : (86) 21-6278 0866

## **Worley, Jordan P**

---

**From:** USCIS Immigrant Investor Program  
**Sent:** Monday, October 31, 2016 1:49 PM  
**To:** Linda Lau  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

Dear Linda Lau,

This is to confirm that the withdrawal request was received on October 27, 2016.

Regards,

Immigrant Investor Program Office  
U.S. Citizenship and Immigration Services  
MS0017

---

**From:** Linda Lau [mailto:[linda@globallawgroup.net](mailto:linda@globallawgroup.net)]  
**Sent:** Friday, October 28, 2016 8:13 PM  
**To:** USCIS Immigrant Investor Program  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

**RE: Confirmation of the Withdrawal of Form I-924 Amendment Application**

**Regional Center Name:** American Everglow Regional Center, LLC

**New Commercial Enterprise:** SeaRhyhm Hotel Fund, LP

**Receipt No.:** RCW1527253110

Dear Sir or Madam,

Our office is the attorney of record in the above-referenced matter (RCW1527253110), and our G-28 is on file with the USCIS.

A Request for Evidence was issued by USCIS on August 4, 2016 with the due date of October 31, 2016. In response, we sent a withdrawal request of the above-reference matter (RCW1527253110) to USCIS on October 25, 2016 (FedEx tracking number: 777546105294), and it was received by USCIS on October 26, 2016. Please find the attachments for the copy of the withdrawal package and the screenshot for the proof of FedEx delivery.

Please confirm that the Form I-924 Amendment Application (RCW1527253110) has been withdrawn.

Thank you for your kind assistance.

Best regards,

Linda Lau

Global Law Group  
600 S. Lake Avenue, Suite 306

(b)(6) Pasadena, CA 91106, USA

w +1(213) 830-9933

c - [REDACTED]

Email: [linda@globallawgroup.net](mailto:linda@globallawgroup.net) [www.globallawgroup.net](http://www.globallawgroup.net)

Shanghai representative office

7/F Building E, 753 Yu Yuan Road, Changning District Shanghai, China 200050 w +86 (21) 6278 0866 | m +86 186 2185 4741

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## **Worley, Jordan P**

---

**From:** USCIS Immigrant Investor Program  
**Sent:** Monday, October 31, 2016 1:47 PM  
**To:** Walker, Shara M (CTR)  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

Thank you, Shara!

**From:** Walker, Shara M (CTR)  
**Sent:** Monday, October 31, 2016 2:46 PM  
**To:** USCIS Immigrant Investor Program  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

Good afternoon,

Yes. The withdrawal was received on the 27<sup>th</sup>.

Shara Walker  
General Clerk III  
(202)357-9336  
Dextera Corporation  
USCIS Immigrant Investor Program Office  
131 M Street NE Washington, D.C.

---

**From:** IPO Work Order Requests  
**Sent:** Monday, October 31, 2016 2:15 PM  
**To:** Walker, Shara M (CTR)  
**Subject:** FW: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

**From:** USCIS Immigrant Investor Program  
**Sent:** Monday, October 31, 2016 2:14 PM  
**To:** IPO Work Order Requests  
**Subject:** FW: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

Would please confirm that the withdrawal request was received?

Thank you!

Sandra  
Immigrant Investor Program Office  
U.S. Citizenship and Immigration Services  
MS0017

**From:** Linda Lau [mailto:[linda@globallawgroup.net](mailto:linda@globallawgroup.net)]  
**Sent:** Friday, October 28, 2016 8:13 PM  
**To:** USCIS Immigrant Investor Program  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

**RE: Confirmation of the Withdrawal of Form I-924 Amendment Application**

**Regional Center Name:** American Everglow Regional Center, LLC

**New Commercial Enterprise:** SeaRhylm Hotel Fund, LP

**Receipt No.:** RCW1527253110

Dear Sir or Madam,

Our office is the attorney of record in the above-referenced matter (RCW1527253110), and our G-28 is on file with the USCIS.

A Request for Evidence was issued by USCIS on August 4, 2016 with the due date of October 31, 2016. In response, we sent a withdrawal request of the above-reference matter (RCW1527253110) to USCIS on October 25, 2016 (FedEx tracking number: 777546105294), and it was received by USCIS on October 26, 2016. Please find the attachments for the copy of the withdrawal package and the screenshot for the proof of FedEx delivery.

Please confirm that the Form I-924 Amendment Application (RCW1527253110) has been withdrawn.

Thank you for your kind assistance.

Best regards,

Linda Lau

Global Law Group  
600 S. Lake Avenue, Suite 306  
Pasadena, CA 91106, USA

(b)(6) +1(213) 830-9933

c [REDACTED]

Email: [linda@globallawgroup.net](mailto:linda@globallawgroup.net) [www.globallawgroup.net](http://www.globallawgroup.net)

Shanghai representative office  
7/F Building E, 753 Yu Yuan Road, Changning District Shanghai, China 200050 w +86 (21) 6278 0866 | m +86 186 2185 4741

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## **Worley, Jordan P**

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**Sent:** Monday, October 31, 2016 1:46 PM  
**To:** USCIS Immigrant Investor Program  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

Good afternoon,

Yes. The withdrawal was received on the 27<sup>th</sup>.

Shara Walker  
General Clerk III  
(202)357-9336  
Dextera Corporation  
USCIS Immigrant Investor Program Office  
131 M Street NE Washington, D.C.

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Thank you!

Sandra  
Immigrant Investor Program Office  
U.S. Citizenship and Immigration Services  
MS0017

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**Sent:** Friday, October 28, 2016 8:13 PM  
**To:** USCIS Immigrant Investor Program  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

**RE: Confirmation of the Withdrawal of Form I-924 Amendment Application**

Regional Center Name: American Everglow Regional Center, LLC  
New Commercial Enterprise: SeaRhyhm Hotel Fund, LP  
Receipt No.: RCW1527253110

Dear Sir or Madam,

Our office is the attorney of record in the above-referenced matter (RCW1527253110), and our G-28 is on file with the USCIS.

A Request for Evidence was issued by USCIS on August 4, 2016 with the due date of October 31, 2016. In response, we sent a withdrawal request of the above-reference matter (RCW1527253110) to USCIS on October 25, 2016 (FedEx tracking number: 777546105294), and it was received by USCIS on October 26, 2016. Please find the attachments for the copy of the withdrawal package and the screenshot for the proof of FedEx delivery.

Please confirm that the Form I-924 Amendment Application (RCW1527253110) has been withdrawn.

Thank you for your kind assistance.

Best regards,

Linda Lau

Global Law Group  
600 S. Lake Avenue, Suite 306  
Pasadena, CA 91106, USA

(b)(6)w +1(213) 830-9933

c - [REDACTED]

Email: [linda@globallawgroup.net](mailto:linda@globallawgroup.net) [www.globallawgroup.net](http://www.globallawgroup.net)

Shanghai representative office  
7/F Building E, 753 Yu Yuan Road, Changning District Shanghai, China 200050 w +86 (21) 6278 0866 | m +86 186 2185 4741

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## **Worley, Jordan P**

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**Sent:** Monday, October 31, 2016 1:14 PM  
**To:** IPO Work Order Requests  
**Subject:** FW: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)  
**Attachments:** Filed package.pdf; Track your package or shipment with FedEx Tracking.pdf

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Thank you!

Sandra  
Immigrant Investor Program Office  
U.S. Citizenship and Immigration Services  
MS0017

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**From:** Linda Lau [mailto:[linda@globallawgroup.net](mailto:linda@globallawgroup.net)]  
**Sent:** Friday, October 28, 2016 8:13 PM  
**To:** USCIS Immigrant Investor Program  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)

**RE: Confirmation of the Withdrawal of Form I-924 Amendment Application**

**Regional Center Name:** American Everglow Regional Center, LLC

**New Commercial Enterprise:** SeaRhyhm Hotel Fund, LP

**Receipt No.:** RCW1527253110

Dear Sir or Madam,

Our office is the attorney of record in the above-referenced matter (RCW1527253110), and our G-28 is on file with the USCIS.

A Request for Evidence was issued by USCIS on August 4, 2016 with the due date of October 31, 2016. In response, we sent a withdrawal request of the above-reference matter (RCW1527253110) to USCIS on October 25, 2016 (FedEx tracking number: 777546105294), and it was received by USCIS on October 26, 2016. Please find the attachments for the copy of the withdrawal package and the screenshot for the proof of FedEx delivery.

Please confirm that the Form I-924 Amendment Application (RCW1527253110) has been withdrawn.

Thank you for your kind assistance.

Best regards,

Linda Lau

Global Law Group  
600 S. Lake Avenue, Suite 306

Pasadena, CA 91106, USA

w +1(213) 830-9933

c -

Email: [linda@globallawgroup.net](mailto:linda@globallawgroup.net) [www.globallawgroup.net](http://www.globallawgroup.net)

Shanghai representative office

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## Worley, Jordan P

---

**From:** Linda Lau <linda@globallawgroup.net>  
**Sent:** Friday, October 28, 2016 7:13 PM  
**To:** USCIS Immigrant Investor Program  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: Confirmation of the Withdrawal of Form I-924 Amendment Application (RCW1527253110)  
**Attachments:** Filed package.pdf; Track your package or shipment with FedEx Tracking.pdf

**RE: Confirmation of the Withdrawal of Form I-924 Amendment Application**

**Regional Center Name:** American Everglow Regional Center, LLC

**New Commercial Enterprise:** SeaRhylm Hotel Fund, LP

**Receipt No.:** RCW1527253110

Dear Sir or Madam,

Our office is the attorney of record in the above-referenced matter (RCW1527253110), and our G-28 is on file with the USCIS.

A Request for Evidence was issued by USCIS on August 4, 2016 with the due date of October 31, 2016. In response, we sent a withdrawal request of the above-reference matter (RCW1527253110) to USCIS on October 25, 2016 (FedEx tracking number: 777546105294), and it was received by USCIS on October 26, 2016. Please find the attachments for the copy of the withdrawal package and the screenshot for the proof of FedEx delivery.

Please confirm that the Form I-924 Amendment Application (RCW1527253110) has been withdrawn.

Thank you for your kind assistance.

Best regards,

Linda Lau

Global Law Group  
600 S. Lake Avenue, Suite 306  
Pasadena, CA 91106, USA

w +1(213) 830-9933

(b)(6) c + [REDACTED]

Email: [linda@globallawgroup.net](mailto:linda@globallawgroup.net) [www.globallawgroup.net](http://www.globallawgroup.net)

Shanghai representative office  
7/F Building E, 753 Yu Yuan Road, Changning District Shanghai, China 200050 w +86 (21) 6278 0866 | m +86 186 2185 4741

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## Worley, Jordan P

---

**From:** Linda Lau <linda@globallawgroup.net>  
**Sent:** Wednesday, September 28, 2016 7:21 PM  
**To:** USCIS Immigrant Investor Program; prime0108@gmail.com  
**Cc:** Kelly Shu; Julie Yue; Ivy Wang  
**Subject:** RE: RCW1535753845 - Courtesy Request for Clarification - Form I-924A (Project: Legend International LP)

**RE: Response to Request for Clarification (Form I-924A)**

**Applicant Name:** American Everglow Regional Center, LLC  
**I-924A Receipt No.:** RCW: 1535753845  
**Regional Center ID:** ID: 1332651296

Dear Sir/Madam:

We represent the applicant, American Everglow Regional Center, LLC (the “Regional Center”) in the above-referenced Form I-924A Supplement to Form I-924 (the “Application”), and our G-28 is on file with the U.S. Citizenship and Immigration Services (“USCIS”).

This is a timely response to USCIS Courtesy Request for Clarification (“RFC”) dated September 27, 2016. The evidence requested by the RFC is to provide full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Sections A – C of the Form I-924A.

As reported in Form I-924A submitted with the Application, Ms. Hua Guo is the principal of American Everglow Regional Center, LLC. In addition, the Regional Center is also providing the information of the following individuals who are involved in the management of the Regional Center. Please find below the full legal name and date of birth of the management team members of the Regional Center:

1. General Manager/LLC Member:

- Full Legal Name: Steven Zhi QIN
- Date of Birth: [REDACTED]

2. Manager/LLC Member:

(b)(6)

- Full Legal Name: Hua GUO
- Date of Birth: [REDACTED]

Should you have any further questions, please do not hesitate to contact our office. Thank you for your kind consideration of this matter.

Sincerely,

Linda Lau, Esq.  
[Linda@globallawgroup.net](mailto:Linda@globallawgroup.net)

## Global Law Group

US Office:  
600 S. Lake Avenue, Suite 306  
Pasadena, CA 91106  
Tel: 1 (213) 830-9933  
www.GlobalLawGroup.net

Shanghai Representative Office :  
7/F, Building E, 753 Yu Yuan Road, Changning District,  
Shanghai, China 200050  
Tel : (86) 21-6278 0866

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**From:** USCIS Immigrant Investor Program [<mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov>]  
**Sent:** Tuesday, September 27, 2016 12:33 PM  
**To:** [prime0108@gmail.com](mailto:prime0108@gmail.com)  
**Cc:** Linda Lau  
**Subject:** RCW1535753845 - Courtesy Request for Clarification - Form I-924A (Project: Legend International LP)

Dear Mr. Hua Guo,/Dear Linda Lau, Esq.

On December 22, 2015, you filed Form I-924A, Supplement to Form I-924, receipt number RCW1535753845.

After a review of the evidence submitted in support of the above-referenced Form I-924A, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Sections A – C of the Form I-924A.

Please respond within 10 business days of the date of this email with the requested information. If no response is received within 10 days, we will proceed with the adjudication (including the issuance of a Request for Evidence, as appropriate) of your petition submitted.

Most Sincerely,  
Immigrant Investor Program Office  
CT0020

## **Worley, Jordan P**

---

**From:** USCIS Immigrant Investor Program  
**Sent:** Friday, September 23, 2016 6:37 AM  
**To:** Mason, Rafaela V  
**Subject:** FW: RCW1527253110 - Courtesy Request for Clarification - Form I-924 (Project: SeaRhylm Hotel Fund, LP)

Immigrant Investor Program Office  
U.S. Citizenship and Immigration Services  
MS0017

---

**From:** Linda Lau [mailto:[linda@globallawgroup.net](mailto:linda@globallawgroup.net)]  
**Sent:** Thursday, September 22, 2016 9:45 PM  
**To:** USCIS Immigrant Investor Program; [prime0108@gmail.com](mailto:prime0108@gmail.com)  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: RCW1527253110 - Courtesy Request for Clarification - Form I-924 (Project: SeaRhylm Hotel Fund, LP)

**RE: Response to Request for Clarification (Form I-924)**

<b>Applicant Name:</b>	<b>American Everglow Regional Center, LLC</b>
<b>New Commercial Enterprise:</b>	<b>SeaRhylm Hotel Fund, LP</b>
<b>I-924A Receipt No.:</b>	<b>RCW: 1527253110</b>
<b>Regional Center ID:</b>	<b>ID: 1332651296</b>

Dear Sir/Madam:

We represent the applicant, American Everglow Regional Center, LLC (the “Regional Center”) in the above-referenced Form I-924 regional center amendment application with actual I-526 petition (the “Application”), and our G-28 is on file with the U.S. Citizenship and Immigration Services (“USCIS”).

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1. General Manager/LLC Member:

(b)(6)

- Full Legal Name: Steven Zhi QIN
- Date of Birth:

2. Manager/LLC Member:

(b)(6)

- Full Legal Name: Hua GUO
- Date of Birth [REDACTED]

Should you have any further questions, please do not hesitate to contact our office. Thank you for your kind consideration of this matter.

Sincerely,

Linda Lau, Esq.  
[Linda@globallawgroup.net](mailto:Linda@globallawgroup.net)  
W: 1 (213) 830-9933

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**Global Law Group**

US Office:  
600 S. Lake Avenue, Suite 306  
Pasadena, CA 91106  
Tel: 1 (213) 830-9933  
[www.GlobalLawGroup.net](http://www.GlobalLawGroup.net)

Shanghai Representative Office :  
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Shanghai, China 200050  
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**From:** USCIS Immigrant Investor Program [mailto:[USCIS.ImmigrantInvestorProgram@uscis.dhs.gov](mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov)]  
**Sent:** Tuesday, September 20, 2016 8:57 AM  
**To:** [prime0108@gmail.com](mailto:prime0108@gmail.com)  
**Cc:** Linda Lau  
**Subject:** RCW1527253110 - Courtesy Request for Clarification - Form I-924 (Project: SeaRhylm Hotel Fund, LP)

Dear Mr. Hua Guo,/Dear Linda Lau, Esq.

On September 29, 2015, you filed Form I-924, Application for Regional Center Under the Immigrant Investor Program, receipt number RCW1527253110.

After a review of the evidence submitted in support of the above-referenced Form I-924, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Section D of the Form I-924.

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Most Sincerely,  
Immigrant Investor Program Office  
CT0020

## **Worley, Jordan P**

---

**From:** USCIS Immigrant Investor Program  
**Sent:** Friday, September 23, 2016 6:35 AM  
**To:** Mason, Rafaela V  
**Subject:** FW: RCW1527153015 - Courtesy Request for Clarification - Form I-924 (Project: Bloomage Villa Fund, LP)

Immigrant Investor Program Office  
U.S. Citizenship and Immigration Services  
MS0017

---

**From:** Linda Lau [mailto:[linda@globallawgroup.net](mailto:linda@globallawgroup.net)]  
**Sent:** Thursday, September 22, 2016 9:47 PM  
**To:** USCIS Immigrant Investor Program; [prime0108@gmail.com](mailto:prime0108@gmail.com)  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: RCW1527153015 - Courtesy Request for Clarification - Form I-924 (Project: Bloomage Villa Fund, LP)

**RE: Response to Request for Clarification (Form I-924)**

<b>Applicant Name:</b>	American Everglow Regional Center, LLC
<b>New Commercial Enterprise:</b>	Bloomage Villa Fund, LP
<b>I-924A Receipt No.:</b>	RCW: 1527153015
<b>Regional Center ID:</b>	ID: 1332651296

Dear Sir/Madam:

We represent the applicant, American Everglow Regional Center, LLC (the “Regional Center”) in the above-referenced Form I-924 regional center amendment application with actual I-526 petition (the “Application”), and our G-28 is on file with the U.S. Citizenship and Immigration Services (“USCIS”).

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1. General Manager/LLC Member:

(b)(6) • Full Legal Name: Steven Zhi QIN  
• Date of Birth

(b)(6) 2. Manager/LLC Member:

- Full Legal Name: Hua GUO
- Date of Birth: [REDACTED]

Should you have any further questions, please do not hesitate to contact our office. Thank you for your kind consideration of this matter.

Sincerely,

Linda Lau, Esq.  
[Linda@globallawgroup.net](mailto:Linda@globallawgroup.net)  
W: 1 (213) 830-9933

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**Cc:** Linda Lau  
**Subject:** RCW1527153015 - Courtesy Request for Clarification - Form I-924 (Project: Bloomage Villa Fund, LP)

Dear Mr. Hua Guo,/Dear Linda Lau, Esq.

On September 28, 2015, you filed Form I-924, Application for Regional Center Under the Immigrant Investor Program, receipt number RCW1527153015.

After a review of the evidence submitted in support of the above-referenced Form I-924, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Section D of the Form I-924.

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Most Sincerely,  
Immigrant Investor Program Office  
CT0020

## Worley, Jordan P

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**From:** USCIS Immigrant Investor Program  
**Sent:** Friday, September 23, 2016 6:32 AM  
**To:** Mason, Rafaela V  
**Subject:** FW: RCW1527153049 - Courtesy Request for Clarification - Form I-924 (Project: American Everglow Regional Center, LLC)

Immigrant Investor Program Office  
U.S. Citizenship and Immigration Services  
MS0017

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**From:** Linda Lau [mailto:[linda@globallawgroup.net](mailto:linda@globallawgroup.net)]  
**Sent:** Thursday, September 22, 2016 9:48 PM  
**To:** USCIS Immigrant Investor Program; [prime0108@gmail.com](mailto:prime0108@gmail.com)  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: RCW1527153049 - Courtesy Request for Clarification - Form I-924 (Project: American Everglow Regional Center, LLC)

**RE: Response to Request for Clarification (Form I-924)**

<b>Applicant Name:</b>	<b>American Everglow Regional Center, LLC</b>
<b>New Commercial Enterprise:</b>	<b>Legend International Investment, L.P.</b>
<b>I-924A Receipt No.:</b>	<b>RCW: 1527153049</b>
<b>Regional Center ID:</b>	<b>ID: 1332651296</b>

Dear Sir/Madam:

We represent the applicant, American Everglow Regional Center, LLC (the “Regional Center”) in the above-referenced Form I-924 regional center amendment application with actual I-526 petition (the “Application”), and our G-28 is on file with the U.S. Citizenship and Immigration Services (“USCIS”).

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1. General Manager/LLC Member:

(b)(6)

- Full Legal Name: Steven Zhi QIN
- Date of Birth:

2. Manager/LLC Member:

(b)(6)

- Full Legal Name: Hua GUO
- Date of Birth: [REDACTED]

Should you have any further questions, please do not hesitate to contact our office. Thank you for your kind consideration of this matter.

Sincerely,

Linda Lau, Esq.

[Linda@globallawgroup.net](mailto:Linda@globallawgroup.net)

W: 1 (213) 830-9933

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**From:** USCIS Immigrant Investor Program [mailto:[USCIS.ImmigrantInvestorProgram@uscis.dhs.gov](mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov)]

**Sent:** Tuesday, September 20, 2016 7:14 AM

**To:** [prime0108@gmail.com](mailto:prime0108@gmail.com)

**Cc:** Linda Lau

**Subject:** RCW1527153049 - Courtesy Request for Clarification - Form I-924 (Project: American Everglow Regional Center LLC)

Dear Mr. Hua Guo,/Dear Linda Lau, Esq.

On September 28, 2015, you filed Form I-924, Application for Regional Center Under the Immigrant Investor Program, receipt number RCW1527153049.

After a review of the evidence submitted in support of the above-referenced Form I-924, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Section D of the Form I-924.

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Most Sincerely,  
Immigrant Investor Program Office  
CT0020

## Worley, Jordan P

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**Sent:** Thursday, September 22, 2016 8:48 PM  
**To:** USCIS Immigrant Investor Program; prime0108@gmail.com  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: RCW1527153049 - Courtesy Request for Clarification - Form I-924 (Project: American Everglow Regional Center, LLC)

**RE: Response to Request for Clarification (Form I-924)**

**Applicant Name:** American Everglow Regional Center, LLC  
**New Commercial Enterprise:** Legend International Investment, L.P.  
**I-924A Receipt No.:** RCW: 1527153049  
**Regional Center ID:** ID: 1332651296

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CT0020

## Worley, Jordan P

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**Sent:** Thursday, September 22, 2016 8:47 PM  
**To:** USCIS Immigrant Investor Program; prime0108@gmail.com  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: RCW1527153015 - Courtesy Request for Clarification - Form I-924 (Project: Bloomage Villa Fund, LP)

**RE: Response to Request for Clarification (Form I-924)**

**Applicant Name:** American Everglow Regional Center, LLC  
**New Commercial Enterprise:** Bloomage Villa Fund, LP  
**I-924A Receipt No.:** RCW: 1527153015  
**Regional Center ID:** ID: 1332651296

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(b)(6)

- Full Legal Name: Steven Zhi QIN
- Date of Birth: [REDACTED]

2. Manager/LLC Member:

- Full Legal Name: Hua GUO
- Date of Birth: [REDACTED]

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**Cc:** Linda Lau  
**Subject:** RCW1527153015 - Courtesy Request for Clarification - Form I-924 (Project: Bloomage Villa Fund, LP)

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Most Sincerely,  
Immigrant Investor Program Office  
CT0020

## Worley, Jordan P

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**From:** Linda Lau <linda@globallawgroup.net>  
**Sent:** Thursday, September 22, 2016 8:45 PM  
**To:** USCIS Immigrant Investor Program; prime0108@gmail.com  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: RCW1527253110 - Courtesy Request for Clarification - Form I-924 (Project: SeaRhylm Hotel Fund, LP)

**RE: Response to Request for Clarification (Form I-924)**

**Applicant Name:** American Everglow Regional Center, LLC  
**New Commercial Enterprise:** SeaRhylm Hotel Fund, LP  
**I-924A Receipt No.:** RCW: 1527253110  
**Regional Center ID:** ID: 1332651296

Dear Sir/Madam:

We represent the applicant, American Everglow Regional Center, LLC (the “Regional Center”) in the above-referenced Form I-924 regional center amendment application with actual I-526 petition (the “Application”), and our G-28 is on file with the U.S. Citizenship and Immigration Services (“USCIS”).

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(b)(6)

- Full Legal Name: Steven Zhi QIN
- Date of Birth: [REDACTED]

2. Manager/LLC Member:

- Full Legal Name: Hua GUO
- Date of Birth: [REDACTED]

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[Linda@globallawgroup.net](mailto:Linda@globallawgroup.net)

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**Sent:** Tuesday, September 20, 2016 8:57 AM

**To:** [prime0108@gmail.com](mailto:prime0108@gmail.com)

**Cc:** Linda Lau

**Subject:** RCW1527253110 - Courtesy Request for Clarification - Form I-924 (Project: SeaRhyIm Hotel Fund, LP)

Dear Mr. Hua Guo,/Dear Linda Lau, Esq.

On September 29, 2015, you filed Form I-924, Application for Regional Center Under the Immigrant Investor Program, receipt number RCW1527253110.

After a review of the evidence submitted in support of the above-referenced Form I-924, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Section D of the Form I-924.

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Most Sincerely,  
Immigrant Investor Program Office  
CT0020

## Worley, Jordan P

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**From:** Linda Lau <linda@globallawgroup.net>  
**Sent:** Thursday, September 22, 2016 8:42 PM  
**To:** USCIS Immigrant Investor Program; prime0108@gmail.com  
**Cc:** Julie Yue; Kelly Shu; Ivy Wang  
**Subject:** RE: RCW1535753845 - Courtesy Request for Clarification - Form I-924A (Project: American Everglow Regional Center, LLC)

**RE: Response to Request for Clarification (Form I-924A)**

**Applicant Name:** American Everglow Regional Center, LLC  
**I-924A Receipt No.:** RCW: 1535753845  
**Regional Center ID:** ID: 1332651296

Dear Sir/Madam:

We represent the applicant, American Everglow Regional Center, LLC (the “Regional Center”) in the above-referenced Form I-924A Supplement to Form I-924 (the “Application”), and our G-28 is on file with the U.S. Citizenship and Immigration Services (“USCIS”).

This is a timely response to USCIS Courtesy Request for Clarification (“RFC”) dated September 16, 2016. The evidence requested by the RFC is to provide full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Sections A – C of the Form I-924A.

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1. General Manager/LLC Member:

- Full Legal Name: Steven Zhi QIN
- Date of Birth: [REDACTED]

(b)(6)

2. Manager/LLC Member:

- Full Legal Name: Hua GUO
- Date of Birth: [REDACTED]

Should you have any further questions, please do not hesitate to contact our office. Thank you for your kind consideration of this matter.

Sincerely,

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**From:** USCIS Immigrant Investor Program [<mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov>]

**Sent:** Friday, September 16, 2016 12:19 PM

**To:** [prime0108@gmail.com](mailto:prime0108@gmail.com)

**Cc:** Linda Lau

**Subject:** RCW1535753845 - Courtesy Request for Clarification - Form I-924A (Project: American Everglow Regional Center, LLC)

Dear Mr. Hua Guo,/Dear Linda Lau, Esq.

On December 22, 2015, you filed Form I-924A, Supplement to Form I-924, receipt number RCW1535753845.

After a review of the evidence submitted in support of the above-referenced Form I-924A, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Sections A – C of the Form I-924A.

Please respond within 10 business days of the date of this email with the requested information. If no response is received within 10 days, we will proceed with the adjudication (including the issuance of a Request for Evidence, as appropriate) of your petition submitted.

Most Sincerely,  
Immigrant Investor Program Office  
CT0020

## **Worley, Jordan P**

---

**From:** USCIS Immigrant Investor Program  
**Sent:** Tuesday, September 20, 2016 9:14 AM  
**To:** prime0108@gmail.com  
**Cc:** linda@globallawgroup.net  
**Subject:** RCW1527153049 - Courtesy Request for Clarification - Form I-924 (Project: American Everglow Regional Center, LLC)

Dear Mr. Hua Guo,/Dear Linda Lau, Esq.

On September 28, 2015, you filed Form I-924, Application for Regional Center Under the Immigrant Investor Program, receipt number RCW1527153049.

After a review of the evidence submitted in support of the above-referenced Form I-924, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Section D of the Form I-924.

Please respond within 10 business days of the date of this email with the requested information. If no response is received within 10 days, we will proceed with the adjudication (including the issuance of a Request for Evidence, as appropriate) of your petition submitted.

Most Sincerely,  
Immigrant Investor Program Office  
CT0020

## **Worley, Jordan P**

---

**From:** USCIS Immigrant Investor Program  
**Sent:** Friday, September 16, 2016 2:19 PM  
**To:** prime0108@gmail.com  
**Cc:** linda@globallawgroup.net  
**Subject:** RCW1535753845 - Courtesy Request for Clarification - Form I-924A (Project: American Everglow Regional Center, LLC)

Dear Mr. Hua Guo,/Dear Linda Lau, Esq.

On December 22, 2015, you filed Form I-924A, Supplement to Form I-924, receipt number RCW1535753845.

After a review of the evidence submitted in support of the above-referenced Form I-924A, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Sections A – C of the Form I-924A.

Please respond within 10 business days of the date of this email with the requested information. If no response is received within 10 days, we will proceed with the adjudication (including the issuance of a Request for Evidence, as appropriate) of your petition submitted.

Most Sincerely,  
Immigrant Investor Program Office  
CT0020

## **Worley, Jordan P**

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**From:** Linda Lau <linda@globallawgroup.net>  
**Sent:** Wednesday, January 13, 2016 2:19 PM  
**To:** USCIS Immigrant Investor Program  
**Subject:** Inquiry of Receipt Notice for RCW1527153015 and RCW1527153049  
**Attachments:** American Everglow RC I-924 Receipt Notice 9282015.pdf; American Everglow RC I-924 Receipt Notice 9282015.pdf

Dear USCIS Immigrant Investor Program:

Please be advised that we have received two receipt notices dated 9/28/15 from USCIS for two applications of I-924A amendment type B with receipt no. RCW1527153015 and receipt no. RCW1527153049 that we filed with USCIS under two projects of American Everglow Regional Center, LLC ; namely Sea Rhlym Hotel Fund, LP and Legend International Investment, LP on 9/24/15. Thus, we appreciate if your office can advise us which receipt notice is for the project under SeaRlytm Hotel Fund, LP and vice versa.

Your prompt response is much appreciated.

Should you have any further questions, please do not hesitate to contact our office. Thank you.

Sincerely,

Linda Lau, Esq.  
Global Law Group  
600 South Lake Avenue, Suite #306  
Pasadena, CA 91106  
Office: (213)830-9933  
Direct: (213)805-5700  
E: linda@globallawgroup.net  
China Mobile:  
+(86)18621854741  
www.globallawgroup.net

his e-mail and any attachments may be confidential and may be protected by the attorney and client privilege, work product doctrine, or other nondisclosure protection. If you believe that it has been sent to you in error, you may not read, disclose, print, copy, store or disseminate the e-mail or any attachments or the information in them. Please reply to the sender that you have received the message in error. Then delete it. Thank you.

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**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

RECEIPT NUMBER RCW1527153015		CASE TYPE 1924 Application for Regional Center Under the Immigrant Investor Pilot Program
RECEIVED DATE September 28, 2015	APPLICATION TYPE: B (AMENDMENT)	REGIONAL CENTER NAME AMERICAN EVERGLOW REGIONAL CENTER LLC
NOTICE DATE September 28, 2015	PAGE 1 of 1	REGIONAL CENTER ID ID1332651296
LINDA LAU GLOBAL LAW GROUP RE: AMERICAN EVERGLOW REGIONAL CENTER LLC 909 EL CENTRO ST STE 1 SOUTH PASADENA CA 91030		NOTICE TYPE: Receipt Notice

**Receipt Notice** - This notice confirms that USCIS has accepted your "Application for Regional Center Under the Immigrant Investor Pilot Program" (Form I-924) for processing. This notice does not grant any immigration status or benefit. This notice does not grant any immigration status or benefit.

**Processing Time** - The current processing time for this type of case is estimated at 120 days. Unlike many other USCIS case types, verification or tracking of this case is not available on our website. We will notify you by mail when we make a decision on this case or if we need further evidence to establish your eligibility for the regional center designation.

**Unique Identifier** - In the top portion of this Notice, you will find a unique identifier that has been assigned to your Form I-924. Unlike a receipt number which changes with every filing, this unique identifier is *permanently* assigned to your approved or prospective regional center, and will be associated with any future request to amend the regional center. Please refer to your regional center's unique identifier as well as to the Form I-924 receipt number in all subsequent correspondence with USCIS regarding this application.

**E-Mail Communication Regarding Your Pending Form I-924 Application** - USCIS has established a direct e-mail communication tool to facilitate communication between USCIS and those applicants with pending Form I-924s. Form I-924 applicants may use the e-mail communication process to correspond with USCIS regarding pending Form I-924 applications, to include questions that may arise if USCIS issues a Request for Evidence (RFE) or a Notice of Intent to Deny (NOID). USCIS may also reach out to Form I-924 applicants via e-mail to informally ask for clarification on certain issues in order to facilitate USCIS' review, understanding, and adjudication of the Form I-924 application. USCIS may also e-mail a courtesy copy of the RFE or NOID to the e-mail address listed on the I-924 and, if applicable, to the e-mail address listed on the Form G-28 associated with the application.

Please use the following table to determine which email address has been assigned to your Form I-924.

If your unique identifier ends in the number:	Then please utilize this email address:
0, 1, or a 2	CSC-EB5-RCID0-2@dhs.gov
3, 4, or 5	CSC-EB5-RCID3-5@dhs.gov
6 or 7	CSC-EB5-RCID6-7@dhs.gov
8 or 9	CSC-EB5-RCID8-9@dhs.gov

Example: If a regional center's unique identifier is IDxxxxxxxxx0, then the regional center's Form I-924 has been assigned to email account CSC-EB5-RCID0-2@dhs.gov, as the unique identifier ends in "0".

**E-Mail "Subject Line" Advisory** - Please ensure that the subject line in your email correspondence contains the following information in this order: (1) Regional Center Unique Identifier; (2) Receipt Number; (3) Regional Center Name. Doing so will facilitate USCIS' timely handling of and response to your email correspondence.

**E-mail Scope** - This e-mail communication tool is to be used solely to facilitate communication between applicants with a pending Form I-924 and USCIS. The scope of the communication must relate to matters concerning the pending Form I-924. The direct e-mail communication initiative is not a forum for general policy and legal questions about adjudicative procedures or decisions, or for questions relating to either "Immigrant Petition by Alien Entrepreneur" (Form I-526), "Petition by Entrepreneur to Remove Conditions" (Form I-829), or any "Appeal or Motion" (Form I-290B). USCIS will not respond to e-mails received concerning issues unrelated to the currently pending Form I-924. For more information about how to make other EB-5 inquiries, visit the EB-5 Inquiries page on the USCIS website ([www.uscis.gov](http://www.uscis.gov)). USCIS will not respond to e-mails received concerning issues unrelated to the currently pending Form I-924 via this email communication process.

**General Questions** - USCIS has a page entitled EB-5 Inquiries at [www.uscis.gov](http://www.uscis.gov) that outlines how the public may make other inquiries on EB-5 related

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC  
CALIFORNIA SERVICE CENTER  
P.O. BOX 30111  
LAGUNA NIGUEL CA 92607-0111  
Customer Service Telephone: (800) 375-5283



**Please see the back of this notice for important information.**

## **Notice for Customers with Disabilities**

USCIS is committed to providing customers with disabilities the same level of access to its programs and activities that customers without disabilities have (see the USCIS Web site for an explanation and examples of accommodations). If you need an accommodation for your appointment due to a disability that affects your access to a USCIS program or activity OR if a disability prevents you from going to the designated USCIS location for your appointment, please call the National Customer Service Center (NCSC) at 1-800-375-5283 (TDD: 1-800-767-1833) to request an accommodation.

**Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS.** For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

**NOTICE:** All domestic USCIS offices are accessible to individuals with physical disabilities. You do not need to request an accommodation if your ONLY need is an accommodation that would enable or facilitate you having physical access to a domestic USCIS office.

**Note:** Naturalization applicants should **not** call the NCSC to request an exception from the English and/or civics testing requirement. You **must** submit Form *N-648, Medical Certification for Disability Exceptions* to request an exception. See the form instructions for additional information.

**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

matters, to include inquiries that you may have after the Form I-924 has been adjudicated. This page clarifies the EB-5 inquiries that are appropriate to send to the general EB-5 mailbox (at [uscis.immigrantinvestorprogram@dhs.gov](mailto:uscis.immigrantinvestorprogram@dhs.gov)), and other avenues that can be used to send questions or inquiries to USCIS that are not suitable for the general EB-5 mailbox.

**Attorney Or Accredited Representative** - If a valid Form G-28 is associated with the Form I-924, USCIS will need to have a viable Form G-28 e-mail address for the legal representative in order to use the e-mail process to correspond with the Form I-924 applicant. If a valid Form G-28 is associated with the Form I-924 applicant, but USCIS does not have a viable Form G-28 e-mail address, then one will need to be obtained prior to USCIS sending any out-going e-mail correspondence to the applicant which discuss issues related to the Form I-924. In such circumstance, the legal representative should provide an updated Form G-28 with a valid e-mail address by sending a pdf of a fully executed Form G-28 to the EB-5 mailbox at [uscis.immigrantinvestorprogram@dhs.gov](mailto:uscis.immigrantinvestorprogram@dhs.gov).

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U.S. CITIZENSHIP & IMMIGRATION SVC  
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**THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.**

RECEIPT NUMBER RCW1527153049		CASE TYPE I-924 Application for Regional Center Under the Immigrant Investor Pilot Program
RECEIVED DATE September 28, 2015	APPLICATION TYPE: B (AMENDMENT)	REGIONAL CENTER NAME AMERICAN EVERGLOW REGIONAL CENTER LLC
NOTICE DATE September 28, 2015	PAGE 1 of 1	REGIONAL CENTER ID ID1332651296
LINDA LAU GLOBAL LAW GROUP RE: AMERICAN EVERGLOW REGIONAL CENTER LLC 909 EL CENTRO ST STE 1 SOUTH PASADENA CA 91030		NOTICE TYPE: Receipt Notice

**Receipt Notice** - This notice confirms that USCIS has accepted your "Application for Regional Center Under the Immigrant Investor Pilot Program" (Form I-924) for processing. This notice does not grant any immigration status or benefit. This notice does not grant any immigration status or benefit.

**Processing Time** - The current processing time for this type of case is estimated at 120 days. Unlike many other USCIS case types, verification or tracking of this case is not available on our website. We will notify you by mail when we make a decision on this case or if we need further evidence to establish your eligibility for the regional center designation.

**Unique Identifier** - In the top portion of this Notice, you will find a unique identifier that has been assigned to your Form I-924. Unlike a receipt number which changes with every filing, this unique identifier is *permanently* assigned to your approved or prospective regional center, and will be associated with any future request to amend the regional center. Please refer to your regional center's unique identifier as well as to the Form I-924 receipt number in all subsequent correspondence with USCIS regarding this application.

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U.S. CITIZENSHIP & IMMIGRATION SVC  
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**Call the NCSC even if you indicated on your application or petition that you require an accommodation. Also, you must contact the NCSC to request an accommodation each time you have an appointment with USCIS.** For example, you must call the NCSC to request an accommodation for your biometrics appointment and again for an accommodation for your interview appointment.

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matters, to include inquiries that you may have after the Form I-924 has been adjudicated. This page clarifies the EB-5 inquiries that are appropriate to send to the general EB-5 mailbox (at [uscis.immigrantinvestorprogram@dhs.gov](mailto:uscis.immigrantinvestorprogram@dhs.gov)), and other avenues that can be used to send questions or inquiries to USCIS that are not suitable for the general EB-5 mailbox.

**Attorney Or Accredited Representative** - If a valid Form G-28 is associated with the Form I-924, USCIS will need to have a viable Form G-28 e-mail address for the legal representative in order to use the e-mail process to correspond with the Form I-924 applicant. If a valid Form G-28 is associated with the Form I-924 applicant, but USCIS does not have a viable Form G-28 e-mail address, then one will need to be obtained prior to USCIS sending any out-going e-mail correspondence to the applicant which discuss issues related to the Form I-924. In such circumstance, the legal representative should provide an updated Form G-28 with a valid e-mail address by sending a pdf of a fully executed Form G-28 to the EB-5 mailbox at [uscis.immigrantinvestorprogram@dhs.gov](mailto:uscis.immigrantinvestorprogram@dhs.gov).

Please see the additional information on the back. You will be notified separately about any other cases you filed.

U.S. CITIZENSHIP & IMMIGRATION SVC

CALIFORNIA SERVICE CENTER

P.O. BOX 30111

LAGUNA NIGUEL CA 92607-0111

**Customer Service Telephone: (800) 375-5283**





October 25, 2016

**Via FedEx (Tracking Number: 777546105294)**

U.S. Citizenship and Immigration Services  
Immigrant Investor Program  
131 M Street, NE  
Mailstop 2235  
Washington, DC 20529

**Please update Counsel's  
address to  
600 S Lake Avenue,  
Suite 306, Pasadena, CA,**

**RE: Request to Withdraw Form I-924 Application**

Regional Center Name:	American Everglow Regional Center, LLC
New Commercial Enterprise:	SeaRhylm Hotel Fund, LP
Receipt Number:	RCW 1527253110

Dear Sir/Madam:

Our office is the attorney of record in the pending Form I-924 regional center amendment application with actual project application (the "Application") referenced above, and our G-28 is on file with the USCIS. Kindly please update our office address as we have moved. The new address is 600 S. Lake Avenue, Suite 306, Pasadena, CA 91106.

This letter serves as a formal request to withdraw the above referenced I-924 application with receipt number referenced above. Attached please find American Everglow Regional Center, LLC's written request to withdraw the Form I-924 amendment with receipt number RCW 1527253110. The withdrawal of the Application will also serve as the response to the Request for Evidence issued by USCIS on August 4, 2016, which is also attached. Kindly provide confirmation that this Application has been withdrawn.

Thank you for your kind assistance in this matter. Please do not hesitate to contact us should you have any questions.

Sincerely,

Linda Lau, Esq.  
*Enclosures*

Page 1

**Exhibit 1 American Everglow Regional Center, LLC's written request to withdraw the Form I-924 amendment with original signature**

## **Affidavit**

1. I, GUO, Hua, the Principal, Member, and Manager of American Everglow Regional Center, LLC, submitted a Form I-924, Amendment to an Approved Regional Center Application with an actual project application. The application was received by USCIS on September 29, 2015, with I-924 receipt number RCW1527253110.
2. I hereby state that I am withdrawing the I-924 Application on behalf of American Everglow Regional Center, LLC. Please take no further action with respect to the adjudication of the Application.

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GUO, Hua (Signature)

---

9/28/2016

Date

**Exhibit 2      USCIS' Request for Evidence**

U.S. Department of Homeland Security  
U.S. Citizenship and Immigration Services

Notice of Action

A#	Application/Petition I-924, Application For Regional Center Under the Immigrant Investor Pilot Program	
Receipt # RCW1527253110	Applicant/Petitioner Hua Guo American Everglow Regional Center, LLC	
Notice Date August 4, 2016	Page 1 of 10	Beneficiary

Linda Lau  
Global Law Group  
909 El Centro St., Ste. 1  
South Pasadena, CA 91030

Request for Evidence

IMPORTANT: WHEN YOU HAVE COMPLIED WITH THE INSTRUCTIONS ON THIS FORM, RESUBMIT THIS NOTICE ON TOP OF ALL REQUESTED DOCUMENTS AND /OR INFORMATION TO THE ADDRESS BELOW. THIS OFFICE HAS RETAINED YOUR PETITION/APPLICATION WITH SUPPORTING DOCUMENTS.

THE INFORMATION REQUESTED BELOW MUST BE RECEIVED BY THIS OFFICE NO LATER THAN EIGHTY-FOUR (84) DAYS FROM THE DATE OF THIS NOTICE. IF YOU DO NOT PROVIDE THE REQUESTED DOCUMENTATION WITHIN THE TIME ALLOTTED, YOUR APPLICATION WILL BE CONSIDERED ABANDONED PURSUANT TO 8 C.F.R. 103.2(B)(3) AND, AS SUCH, WILL BE DENIED.

CSC \_\_\_\_\_ WS \_\_\_\_\_ DIV I

**RETURN THIS NOTICE ON TOP OF THE REQUESTED INFORMATION LISTED ON THE ATTACHED SHEET.**

Note: You are given until October 31, 2016 in which to submit the information requested.

Pursuant to 8 C.F.R. 103.2(b)(11) failure to submit ALL evidence requested at one time may result in the denial of your petition.

For more information, visit our website at [www.uscis.gov](http://www.uscis.gov)

Or call us at **1-800-375-5283**

Telephone service for the hearing impaired: **1-800-767-1833**

You will be notified separately about any other applications or petitions you filed. Save a photocopy of this notice. Please enclose a copy of it if you write to us about this case, or if you file another application based on this decision. Our address is:

**U.S. CITIZENSHIP AND IMMIGRATION SERVICES  
IMMIGRANT INVESTOR PROGRAM  
131 M STREET, NE  
MAILSTOP 2235  
WASHINGTON, DC 20529**

American Everglow Regional Center  
RCW1527253110  
ID1332651296  
Page 2

**Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program;  
Request for Evidence**

A request for initial designation as a Regional Center under the Immigrant Investor Program (“Investor Program”) or an amendment to an existing Regional Center designation, may involve:

1. A request for review of an exemplar Form I-526, Immigrant Petition by Alien Entrepreneur, prior to the filing of Form I-526 Petitions by individual alien entrepreneurs with USCIS and/or;
2. In the case of a Regional Center amendment request, a review of a new specific capital investment project where the Regional Center designation involved a review of an exemplar capital investment project.

It appears that you are requesting an amendment to your Regional Center designation, to include a review of a specific investment project.

**I. Procedural History and Regional Center Background**

The Regional Center entity, American Everglow Regional Center (“AERC”), was established on October 2, 2013 in California, and is structured as an LLC. AERC was initially approved for designation in the Pilot Program on February 18, 2014. Based on the initial designation and any subsequently approved designation amendments, AERC has jurisdiction over the following geographic area:

<b>State of California</b>	<b>Counties</b>	<b>Approval Date</b>
	Los Angeles	February 18, 2014
	Orange	February 18, 2014
	Riverside	February 18, 2014
	San Bernardino	February 18, 2014

AERC has or plans to offer EB-5 capital investment opportunities in affiliated new commercial enterprises, organized as LPs, focusing on projects in the following approved industry categories:

<b>Industry Category</b>	<b>NAICS</b>	<b>Approval Date</b>
Traveler Accommodation	7211	February 18, 2014
Food and Beverage Stores	445	February 18, 2014
Restaurants and Other Eating Places	7225	February 18, 2014
Nonresidential Building Construction	2362	February 18, 2014
Furniture and Home Furnishing Merchant Wholesalers	4232	February 18, 2014
Professional and Commercial Equipment Wholesalers	4234	February 18, 2014

American Everglow Regional Center  
RCW1527253110  
ID1332651296  
Page 3

The capital investment projects have or will involve a combination of an equity investment and loan to job creating enterprises located within the proposed bounds of the Regional Center.

AERC is now requesting to modify its Regional Center designation as follows:

The Regional Center seeks to raise EB-5 capital for investment into the SeaRhylm Hotel Fund, LP, which will in turn develop, construct, manage, and operate a 150-room, mid-range hotel and a 39-unit residential community in Victorville, San Bernardino, California.

Based upon a review of the initial record of evidence, United States Citizenship and Immigration Services (USCIS) cannot conclude that the applicant has established eligibility to amend its regional center designation. To assist the applicant in focusing on the deficiencies in the existing record, USCIS serves this Request for Evidence. The deficiencies of the current record are outlined below.

## **II. Evidentiary Requirements for Regional Center Proposals**

8 CFR 204.6 (m)(3) describes the evidence that must be submitted in support of a Regional Center proposal. After review of your proposal, the following information, evidence and/or clarification is required. Note that in response to this notice, that it is helpful to provide a cover letter that acts as an executive summary, followed by a table of contents with sections that are tabbed at the bottom of the page.

### **1. Indirect Job Creation (8 CFR 204.6(m)(3)(ii)):**

Section 610(c) of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993, as amended, allows aliens admitted under the pilot program described in this section to establish reasonable methodologies for determining the number of jobs created by the pilot program, including jobs which are estimated to have been created indirectly through revenues, improved regional productivity, job creation, or increased domestic capital investment resulting from the pilot program.

8 CFR 204.6(m)(3)(ii) requires that a Regional Center proposal must provide in verifiable detail how jobs will be created indirectly, while 8 CFR 204.6(m)(3)(v) describes the analytical tools that the Regional Center must employ when making economic and job creation predictions. It is also noted in 8 CFR 204.6(m)(1) in pertinent part that *except as provided herein, aliens seeking to obtain immigration benefits under this paragraph continue to be subject to all conditions and restrictions set forth in section 203(b)(5) of the Act and this section.*

The reliability of job creation estimates provided by an economic analysis are dependent upon the validity of the information and assumptions that form the basis for the analysis.

American Everglow Regional Center  
RCW1527253110  
ID1332651296  
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Any business plan, based on a hypothetical project(s), actual project(s), or actual project(s) supported by an I-526 Exemplar Petition, provided in support of a Regional Center proposal or amendment must contain sufficient specificity to provide valid and reasoned inputs into the economic model, if such a model is used to demonstrate job creation for EB-5 purposes. Otherwise, a determination cannot be made that the Regional Center proposal demonstrates in “verifiable detail” how the requisite jobs will be created.

The economic model described in the proposal is RIMS II. The applicant’s economist assumed that all of the construction and operational inputs into the model would have taken place in 2015; therefore, he deflated all inputs from 2015 to the RIMS II model year of 2010. While the business plan’s timeline (Business Plan, pg. 11 and elsewhere) is purposefully vague on the month and year of commencement of the various parts of the plan (e.g. construction, delivery/closeout of construction, and operations), obviously, construction would take place prior to operations. The economist’s treatment of the inputs has the effect of inflating the job creation estimates. USCIS therefore cannot establish whether or not the project will create the required number of jobs for the anticipated number of EB-5 investors.

In light of the above, please provide an updated actual business plan for each of the industry categories for which AERC seeks designation. The business plan and economic analysis must show:

- The feasibility of the project under current market conditions within the Regional Center;
- Transparently show the basis for the data that will be used as the inputs to the model (to include how the estimation of the creation of the direct jobs were derived);
- The RIMS II calculations used to determine the jobs that will be created, supported by the relevant data; and
- The deflators used and why they are appropriate.

In addition, the submission must clearly identify the timeframe for the commencement, implementation, and realization of each project, how the investors’ funds will flow to the job creating entity, and as a result, how the jobs will be created.

Note, when relying on economic models for estimating job creation<sup>1</sup>, any jobs directly created within the new commercial enterprise in which the immigrant investor has invested, will be for qualifying employees as defined in 8 CFR 204.6(e), and must be

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<sup>1</sup> Note: USCIS does not accept or credit creation of temporary “construction jobs” within a business plan or economic job creation forecasts activities which involve a limited duration construction phase of less than 2 years. See [http://www.uscis.gov/USCIS/Laws/Memoranda/Static%20Files/Memoranda/2009/eb5\\_17jun09.pdf](http://www.uscis.gov/USCIS/Laws/Memoranda/Static%20Files/Memoranda/2009/eb5_17jun09.pdf), pages 2 and 5.

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documented by the supporting evidence required in 8 CFR 204.6(j)(4)(i) and 8 CFR 216.6(a)(4)(iv).

## **2. Regional Center Request for Approval of an Actual Project**

### **Project – 8 CFR 204.6(j) and Matter of Ho**

To qualify as a regional center, the regional center must provide in verifiable detail how jobs will be created. 8 CFR 204.6(m)(ii). In addition, a request for regional center designation or amendment to the designation may include a review of a new specific capital investment project and/or a request for review of an exemplar Form I-526 Petition.

- **Hypothetical Project – 8 CFR 204.6(m)(ii):** A hypothetical project is a project used to demonstrate how an actual investment project will be capitalized and operated in a manner that will create at least 10 direct or indirect jobs per alien investor for a particular industry segment. Although only proposals, hypothetical projects must still show, in verifiable detail, how jobs will be created and how the Regional Center through this project will positively impact the region utilizing reasonable economic methodologies.
- **Actual Project – 8 CFR 204.6(j)(4):** An actual project is a project that the applicant feels certain will meet established EB-5 eligibility requirements outlined in 8 CFR 204.6(j) and Matter of Ho, 22 I. & N. Dec. 206, (Assoc. Comm'r 1998). Generally, this would be a project that has advanced to the stage where work may begin immediately upon approval of the project. If the applicant wishes to have an **exemplar Form I-526 Petition** reviewed, then the application must be supported by the filing of an exemplar Form I-526 Petition, with all supporting documentation to determine if it is in compliance with established EB-5 eligibility requirements. If approved, an actual project, and, if applicable, an exemplar Form I-526 Petition, will be included in the Form I-924 Application approval notice by name.

If the business plan and economic methodology (IMPLAN, RIMS II, etc.) used in the analysis submitted with any subsequently filed individual immigrant investors' Form I-526 Petitions are the same as what was submitted for the actual project in this Form I-924 Application, USCIS will give deference to both of these documents which derived the job creation estimates.

**NOTE:** In addition to the deference given to the business plan and economic analysis, USCIS will also give deference to any organizational documents submitted with individual investors' Form I-526 Petitions if a Form I-526 exemplar is included in the Form I-924 application and USCIS concludes that the organizational documents comply with program requirements. However, it should be noted that if the business plan, the economic analysis, and/or the organizational documents are materially changed at the time of filing the Form I-526 Petition, USCIS will review

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the new business plan, economic analysis, and/or organizational documents to determine whether the petitioner has complied with the requirements of the EB-5 program including the job creation requirements.

Please clarify at this time if the applicant wishes the project(s) to be considered:

1. A hypothetical project;
2. An actual project; or
3. An actual project with Form I-526 Exemplar.

If the applicant wishes to have the project considered as a hypothetical, individual Form I-526 Petitions may be filed at a later date with more details required at that time concerning the project if the Form I-924 Application is approved. The applicant also has the option of filing a Form I-924 Amendment after receiving Regional Center designation, requesting USCIS review and approval of a project that complies with 8 CFR 204.6(j) and Matter of Ho.

If, however, the applicant is seeking USCIS's review and approval of the project as an actual project to be named in the approval notice, then the applicant must provide a comprehensive business plan. If USCIS determines that the actual project does not comply with 8 CFR 204.6(j) and Matter of Ho, but complies with the lesser standard for a hypothetical project, the Form I-924 Application may be approved without specifically identifying the project in the Form I-924 approval letter.

Please include one of the following options in the response to this request for evidence in order to clarify the request:

- Please review the project as a "hypothetical" project as it does not yet comply with 8 CFR 204.6(j) and Matter of Ho at this time. It is understood that USCIS will evaluate the I-924 Application request according to 8 CFR 204.6(m) and the project will not be specifically named in the I-924 Application approval notice. AERC understands that either individual I-526 Petitions or an I-924 Amendment will be filed at a later date with more details to comply with the eligibility requirements outlined in 8 CFR 204.6(j) and Matter of Ho.
- Please review the project as an actual project. If approved, it is understood that the project will be mentioned by name in the I-924 approval notice. If USCIS determines that the proposed investment does not meet the eligibility standards outlined in 8 CFR 204.6(j) and Matter of Ho, but complies with the regional center standards in 8 CFR 204.6(m). AERC understands that the I-924 Application may be approved without mentioning the project by name in the I-924 Application approval letter.

- Please review the project as an actual project with Form I-526 exemplar. If approved, it is understood that the project will be mentioned by name in the I-924 approval notice. If USCIS determines that the proposed investment does not meet the eligibility standards outlined in 8 CFR 204.6(j) and Matter of Ho, but complies with the regional center standards in 8 CFR 204.6(m). AERC understands that the I-924 Application may be approved without mentioning the project by name in the I-924 Application approval letter.

8 CFR 204.6(j)(4) requires evidence that the new commercial enterprise (NCE) will create at least 10 full-time positions per EB-5 investor. Pursuant to 8 C.F.R. § 204.6(j)(4)(i)(B), if the employment-creation requirement has not been satisfied prior to filing the I-526 petition, the petitioner must submit a “comprehensive business plan.” To be considered “comprehensive,” a business plan must be sufficiently detailed to permit the USCIS to reasonably conclude that the NCE has the potential to meet the job-creation requirements. In Matter of Ho, 22 I. & N. Dec. 206 (Assoc. Comm'r, 1998), the Administrative Appeals Office held that a “comprehensive business plan as contemplated by the regulations should contain, at a minimum, a description of the business, its products and/or services, and its objectives.” Elaborating on the contents of an acceptable business plan, the decision states the following:

The plan should contain a market analysis, including the names of competing businesses and their relative strengths and weaknesses, a comparison of the competition's products and pricing structures, and a description of the target market/prospective customers of the new commercial enterprise. The plan should list the required permits and licenses obtained. If applicable, it should describe the manufacturing or production process, the materials required, and the supply sources. The plan should detail any contracts executed for the supply of materials and/or the distribution of products. It should discuss the marketing strategy of the business, including pricing, advertising, and servicing. The plan should set forth the business's organizational structure and its personnel's experience. It should explain the business's staffing requirements and contain a timetable for hiring, as well as job descriptions for all positions. It should contain sales, cost, and income projections and detail the bases therefor. Most importantly, the business plan must be credible. Matter of Ho, 22 I. & N. Dec. 206 at 213 (Assoc. Comm'r, 1998)

If AERC would like the project(s) named in the approval letter, provide evidence to establish eligibility, such as:

**Matter of Ho Compliant Business Plan:**

**Permits and Licenses**

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- Provide evidence that the appropriate permits and licenses have been obtained in order to begin work on the project.
  - Building projects – provide evidence that all necessary building permits have been obtained including any Environmental Protection Agency permits necessary to immediately begin construction.
- Provide evidence of agreements entered into with other companies to provide marketing, goods, or services for the job creating entity.

NOTE: If providing the permits would require the submission of scores, hundreds, or thousands of pages of documents, then just provide a letter from the appropriate city, county, state, or federal agency that confirms the permits have been issued.

### **Contracts**

- Supply: Provide evidence of any contracts executed for the supply of materials or services.
- Distribution: Provide evidence of any contracts for the distribution of products or services.

### **Staffing**

- Requirements: Explain the job creating business's staffing requirements.
- Timetable: Provide a timetable for the hiring of the job creating entity's staff.
- Descriptions: Provide job descriptions for all positions with the job creating entity. Be sure to indicate the management structure of the job creating enterprise.

### **Projections**

- Total Project Cost: List the total costs for the project. Indicate the following:
  - Projected EB-5 Funds
  - Projected Non-EB-5 funds and their source if applicable (e.g., developers, municipal bonds, loans, etc.)
  - Secure commitment from Non-EB-5 investors if applicable (contracts, bonds, loans, letter of confirmation from the lender, other sources, etc.)

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- Expenditures: Provide clear and verifiable projections for expenditures to be applied to the new job creating entity.
- Infusion of EB-5 Capital: Indicate the following:
  - Provide actual dates or a detailed explanation of the infusion of EB5 capital into the job creating enterprise in relation to expected job creation within 2 years of the start of the project.
    - Indicate if there are EB5 groups assigned to phases of the project.
    - Indicate if any of these funds are used as a bridge loan.
      - If yes, indicate the total number of employees prior to the infusion of the EB-5 funds.
- Goals: Provide a timetable of actual dates or projected milestones and the ultimate completion of the project for implementation of project goals, (e.g., acquisition of permits, buildings, etc.)
- Costs: Provide cost projections for the new job creating enterprise:
  - Include costs of permits, reports and design fees, developer fees, finance fees, construction loan interest fees, and any other costs or fees for each project;
  - Indicate where the money for these fees would come from

### **III. Conclusion**

USCIS has determined that the record submitted does not establish eligibility for the benefit sought. Accordingly, USCIS has requested evidence which addresses the issues outlined above. As required by regulation, the applicant must prove, by a preponderance of the evidence (that it is more likely than not), that the applicant is fully qualified for the benefit sought. Please note that USCIS will make a final decision based on the initial evidence submitted upon filing and after consideration of all additional evidence submitted in response to this request.

#### **NOTES:**

*Any document submitted to the USCIS containing a foreign language, must be accompanied by a full English language translation that has been certified by the translator as complete and accurate, and that the translator is competent to translate from the foreign language into English. Submit clear and legible copies of all requested evidence. If clear and legible copies are not possible, submit the original documents. These originals will be returned, if requested.*

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*Please provide an index of any submitted evidence and include corresponding tabs for each section of evidence.*

**Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers**

**Dates: January 1, 2014 to May 31, 2017**

The following is a list of the number of approved and denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by regional center. These regional centers are listed in alphabetical order. The list includes only regional centers that remain designated by USCIS and that had Form I-526 approvals or denials associated with the regional center as of the date this report was generated.

This page does not represent a legal notice or investment advice of any kind. Potential investors are encouraged to seek professional advice before making any investment decisions. Form I-526 petitions may be denied for various reasons, some of which may be based on investor specific issues and not related to any project issues. Form I-526 petitioners in certain cases may file an appeal and/or a motion of an adverse decision.

This page is provided for informational purposes only. The report reflects the most updated estimated data on the number of approvals and denials available at the time the report is generated. However, if USCIS terminates a regional center's designation after the report is generated, USCIS will remove the terminated regional center's name and the associated data from the list below when the terminated regional center's name is added to the list of terminated regional centers [here](#). To report information believed to be incorrect, please email USCIS at [USCIS.ImmigrantInvestorProgram@uscis.dhs.gov](mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov). The official point of contact may also submit updates in writing to the following address:

USCIS, Immigrant Investor Program  
131 M Street NE  
3rd Floor, Mailstop 2235  
Washington, DC 20529

**Note:** You can find a list of current regional centers [here](#). USCIS plans to update this page periodically but makes no claims that the published list below is complete, timely or accurate. Any use or reliance on the information provided is strictly at your own risk. Please see [USCIS Website Policies](#) for further information.

USCIS has issued a joint advisory with the U.S. Securities and Exchange Commission (SEC), [Investor Alert: Investment Scams Exploit Immigrant Investor Program](#). The SEC offers free [investor education materials](#). For more information, visit [Investor.gov](#).

Source: Department Of Homeland Security, U.S. Citizenship and Immigration Services, Master Data File, May 31, 2017.

- List of Regional Centers Last Updated: [Date updated]
- Number of Approvals and Denials Last Updated: [Date updated]

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

Regional Center	Number of Approvals	Number of Denials
168 AMERICA REGIONAL CENTER LLC	8	0
AAA CALIFORNIA REGIONAL CENTER	3	0
ACSRC, LLC	65	4
ADMIRALTY CALIFORNIA REGIONAL CENTER LLC	34	4
ADVANTAGE AMERICA CALIFORNIA REGIONAL CENTER LLC	6	3
ADVANTAGE AMERICA NEW YORK REGIONAL CENTER LLC	32	4
AERO-SPACE PORT INTERNATIONAL (ASPI) GROUP REGIONAL CENTER	10	16
AFC REGIONAL CENTER LLC (FORMERLY NEW YORK FEDERAL REGIONAL CENTER)	1	0
ALLIANCE REGIONAL CENTER	38	5
AMERICA S CENTER FOR FOREIGN INVESTMENT	71	27
AMERICAN AMBITION REGIONAL CENTER CHICAGO LLC	43	1
AMERICAN BUILDERS REGIONAL CENTER LLC	0	1
AMERICAN EVERGLOW REGIONAL CENTER LLC	20	1
AMERICAN FRANCHISE REGIONAL CENTER LLC	12	1
AMERICAN GATEWAY REGIONAL CENTERS LLC	108	4
AMERICAN INVESTMENT AND IMMIGRATION CENTER LLC	6	2
AMERICAN LENDING CENTER LLC (FORMERLY UNITED STATES EMPLOYMENT DEVELOPMENT LENDING CENTER)	71	27
AMERICAN LIBERTY REGIONAL CENTER LLC	15	0
AMERICAN LIFE DEVELOPMENT COMPANY LLC (FORMERLY RIVERSIDE PUMA AREA RC)	7	42
AMERICAN LIFE, INC. - LAKWOOD REGIONAL CENTER	47	0
AMERICAN LIFE, INC. REGIONAL CENTER - SEATTLE (GOLDEN RAINBOW & GATEWAY FREEDOM FUND)	296	15
AMERICAN LOGISTICS [INTERNATIONAL] REGIONAL CENTER	1	40
AMERICAN NORTHERN MARIANAS REGIONAL CENTER	45	0
AMERICAN NW REGIONAL CENTER LLC	35	3
AMERICAN OIL	30	0
AMERICAN PATHWAY REGIONAL CENTER LLC	3	2
AMERICAN REDEVELOPMENT REGIONAL CENTER	134	11
AMERICAN REGIONAL CENTER	2	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

AMERICAN REGIONAL CENTER FOR ENTERPRENEURS	68	5
AMERICAN REGIONAL CENTER FOR ENTREPRENEURS INC	114	2
AMERICAN UNITED EB 5 REGIONAL CENTER	167	4
AMERICAN VANTAGE REGIONAL CENTER	4	0
AMERICAN VENTURE SOLUTIONS REGIONAL CENTER LLC	30	3
AMERICAN YIYO REGIONAL CENTER	0	1
AMERICA'S CENTER FOR FOREIGN INVESTMENT, LLC	14	2
AMWEALTH LP	66	6
APPALACHIAN EB 5 REGIONAL CENTER	89	20
ARCG FLORIDA REGIONAL CENTER LLC	0	1
ARCG NEVADA REGIONAL CENTER LLC (FORMERLY GEOTHERMAL REGIONAL CENTER LLC)	0	3
ASCENDAMERICA LLC	12	0
ATLANTA EB5 REGIONAL CENTER LLC	30	2
ATLANTIC CITY REGIONAL CENTER	71	1
ATLANTIC REGIONAL CENTER FOR FOREIGN INVESTMENT LLC	85	18
BERKELEY REGIONAL CENTER	10	0
BIRCHLEAF MIAMI 31, LLC	1	0
CALIFORNIA CONSORTIUM FOR AGRICULTURAL EXPORT (CCAE)	3	2
CALIFORNIA ENERGY INVESTMENT CENTER	253	21
CALIFORNIA FOREIGN INVESTMENT AND IMMIGRATION CENTER LLC	23	0
CALIFORNIA GLOBAL ALLIANCE LLC	1	1
CALIFORNIA GOLDEN PACIFIC REGIONAL CENTER LLC (FORMERLY US GOLDEN PACIFIC REGIONAL CENTER LLC)	2	0
CALIFORNIA GREENHOUSE FARM REGIONAL CENTER	26	0
CALIFORNIA INTERNATIONAL REGIONAL CENTER LLC	5	0
CALIFORNIA INVESTMENT IMMIGRATION FUND, LLC	0	32
CALIFORNIA MILITARY BASES (CMB) EXPORT LLC	931	12
CALIFORNIA ONE INVESTMENT CENTER LLC	2	0
CALIFORNIA PACIFIC GROUP REGIONAL CENTER LLC	8	4
CALIFORNIA REAL ESTATE REGIONAL CENTER LLC	104	4
CALIFORNIA REGIONAL CENTER LLC	17	1
CALIFORNIA WINERIES & VINEYARDS, LLC REGIONAL CENTER	2	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

CANAM FLORIDA REGIONAL CENTER LLC	0	4
CANAM LOS ANGELES COUNTY REGIONAL CENTER, LLC (FORMER NAME LOS ANGELES FILM REGIONAL CENTER)	87	108
CAPITAL AREA REGIONAL CENTER™ (CARC™)	21	2
CAROLINA CENTER FOR FOREIGN INVESTMENT LLC	11	0
CAROLINA GLOBAL REGIONAL CENTER CORP	0	1
CAROLINA GROWTH REGIONAL CENTER LLC	149	3
CAROLINA STATES REGIONAL CENTER LLC	12	0
CENTRAL ARIZONA REGIONAL CENTER	45	243
CENTRAL WESTERN REGIONAL CENTER LLC (FORMERLY USA MIDWEST REGIONAL CENTER LLC)	0	3
CENTURY AMERICAN REGIONAL CENTER	252	30
CHARLOTTE HARBOR REGIONAL CENTER, LLC	5	4
CHESAPEAKE REGIONAL CENTER	95	2
CHICAGOLAND FOREIGN INVESTMENT GROUP (CFIG) REGIONAL CENTER	74	83
CITY OF DALLAS RC (CDRC)	25	4
CITY OF DALLAS REGIONAL CENTER	284	17
CITY OF DALLAS REGIONAL CENTER CDRC	9	0
CIVITAS EL PASO REGIONAL CENTER	5	6
CIVITAS NEW YORK REGIONAL CENTER	63	7
CIVITAS SOCAL REGIONAL CENTER	27	1
CIVITAS TEXAS REGIONAL CENTER	188	7
CLARK COUNTY REGIONAL CENTER	2	0
CLEARWATER BEACH RESORT REGIONAL CENTER	5	0
CLEVELAND INTERNATIONAL FUND LTD	232	8
CLOUDSEED INTERNATIONAL FUND LLC	2	1
CMB EXPORT LLC	1363	97
CMB ILLINOIS REGIONAL CENTER LLC	48	5
CMB PENNSYLVANIA REGIONAL CENTER LLC	185	3
CMB SOUTHEAST REGIONAL CENTER LLC	23	1
CMB SUMMIT LLC	113	20
CMB TEXAS LLC	282	8
COLORADO INTERCONTINENTAL REGIONAL CENTER, LLC	16	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

COLORADO REGIONAL CENTER LLC	4	0
CONTINENTAL REGIONAL CENTER LLC (FORMERLY USA CONTINENTAL REGIONAL CENTER, LLC)	44	3
CORSARIO NEW YORK METRO REGIONAL CENTER LLC	0	1
CP REGIONAL CENTER	128	3
CP TENNESSEE REGIONAL CENTER INC DBA CP SOUTHERN REGIONAL CENTER	3	0
CROWN POINT REGIONAL CENTER, LLC	2	1
DC REGIONAL CENTER	548	28
DELAWARE VALLEY REGIONAL CENTER	421	7
DOS LAGOS REGIONAL CENTER, LLC	51	1
EASTERN WASHINGTON REGIONAL CENTER LLC	1	0
EB 5 AMERI HOLDINGS LLC	1	0
EB 5 FUND REGIONAL CENTER	51	0
EB 5 IMPACT CAPITAL REGIONAL CENTER LLC	0	1
EB 5 JOBS FOR MASSACHUSETTS INC	18	2
EB 5 NEW YORK STATE LLC	0	1
EB5 AFFILIATE NETWORK STATE OF ARIZONA REGIONAL CENTER LLC	0	6
EB5 AFFILIATE NETWORK STATE OF FLORIDA REGIONAL CENTER LLC	14	0
EB5 CAPITAL CALIFORNIA REGIONAL CENTER	43	5
EB5 CAPITAL- DC REGIONAL CENTER	87	10
EB5 CAPITAL NEW YORK REGIONAL CENTER	0	1
EB5 FINANCING MANAGEMENT COMPANY LLC	0	2
EB5 FLORIDA REAL ESTATE REGIONAL CENTER LLC	1	0
EB-5 JOBS FOR MASSACHUSETTS, INC.	79	1
EB-5 NEW YORK STATE LLC (FORMERLY : UPSTATE NEW YORK REGIONAL CENTER (UNYRC))	42	3
EB-5 NEW YORK STATE, LLC (FORMERLY UPSTATE NEW YORK REGIONAL RC, LLC)	51	27
EB5 OPPORTUNITIES FUND LLC	7	2
EB5 REGIONAL CENTER OF AMERICA LLC	0	39
EB5 UNITED WEST REGIONAL CENTER LLC	0	9
EB5 WEST LLC	2	0
EMPIRE STATE EB5 REGIONAL CENTER LLC	7	0
ENCORE MISSISSIPPI REGIONAL CENTER	5	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

ENCORE MISSISSIPPI REGIONAL CENTER EMRC	1	0
ENCORE TEXAS RC LLC ETRC	24	0
EXTELL NEW YORK REGIONAL CENTER LLC	269	40
FARM FOR AMERICA REGIONAL CENTER	32	12
FDIUS REGIONAL CENTER	7	0
FLEET NEW YORK METROPOLITAN REGIONAL CENTER LLC (FKA FEDERAL NEW YORK METROPOLITAN REGIONAL CENTER)	212	1
FLORIDA EB5 INVESTMENTS LLC REGIONAL CENTER	328	149
FLORIDA EB-5 REGIONAL CENTER LLC	35	2
FLORIDA EB-5 REGIONAL CENTER, LLC	13	0
FLORIDA EQUITY & GROWTH FUND REGIONAL CENTER(FEGF-RC)	20	0
FLORIDA EQUITY AND GROWTH FUND REGIONAL CENTER LLC	57	11
FLORIDA GATEWAY REGIONAL CENTER LLC	0	5
FLORIDA OVERSEAS INVESTMENT CENTER	319	30
FLORIDA OVERSEAS INVESTMENT CENTER RC	148	11
FLORIDA REGIONAL CENTER, LLC	276	14
FRISCO TEXAS INTERNATIONAL DEVELOPMENT CENTER	74	1
GEORGIA CENTER FOR FOREIGN INVESTMENT AND DEVELOPMENT, GCFID LLC	25	18
GEORGIA REGIONAL CENTER, LLC	113	1
GLOBAL PREMIER AMERICA REGIONAL CENTER	52	4
GO EB5 RC REGIONAL CENTER, LLC (FORMERLY GO USA EB-5 REGIONAL CENTER LLC)	8	0
GOLD COAST FLORIDA REGIONAL CENTER, LLC	153	23
GOLDEN CALIFORNIA REGIONAL CENTER	19	1
GOLDEN LAMP REGIONAL CENTER (FORMER NAME UTAH HIGH COUNTRY REGIONAL CENTER INC)	31	0
GOLDEN OPPORTUNITY REGIONAL CENTER	9	2
GOLDEN PACIFIC VENTURES REGIONAL CENTER	1	0
GOLDEN STATE REGIONAL CENTER	78	2
GOLDEN STATE RENAISSANCE VENTURES LLC DBA GOLDEN GATE GLOBAL	576	20
GOTHAM CITY REGIONAL CENTER LLC	477	77
GRAND CANYON REGIONAL CENTER, LLC	132	11
GREAT OCEAN REGIONAL CENTER LLC AKA GREAT OCEAN CAPITAL HOLDING LLC	2	0
GREAT TEXAS REGIONAL CENTER LLC	28	12

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

GREATER NEW YORK REGIONAL CENTER LLC	40	0
GREEN CARD FUND, LLC	125	13
GREEN DETROIT REGIONAL CENTER LLC	25	1
GREEN DETROIT REGIONAL CENTER, LLC	0	1
GREEN ENERGY REGIONAL CENTER, LLC (GERC)	8	2
GULF COAST FUNDS MANAGEMENT LLC	19	129
GULF COAST REGIONAL INVESTMENT CENTER, LLC	107	2
GULF COAST RENEWABLE & REDEVELOPMENT LLC A REGIONAL CENTER	5	0
GULF STATES REGIONAL CENTER LLC	117	8
HAWAII REGIONAL CENTER	150	10
HAWAIIAN ISLANDS REGIONAL CENTER	34	1
HOLLYWOOD BEACH REGIONAL CENTER LLC	0	1
HOLLYWOOD INTERNATIONAL REGIONAL CENTER	212	6
HOLLYWOOD REGIONAL CENTER	0	1
HOME PARADISE REGIONAL CENTER	460	10
HOUSTON EB 5 REGIONAL CENTER	9	0
HOUSTON EB5 REGIONAL CENTER (FORMERLY DC PARTNERS REGIONAL CENTER)	43	4
ICONIC CARIBBEAN EB 5 LLC	89	2
IDAHO STATE REGIONAL CENTER	2	155
IMPERIAL REGIONAL CENTER	55	0
INLAND EMPIRE RENEWABLE ENERGY REGIONAL CENTER	76	0
INTERCONTINENTAL REGIONAL CENTER TRUST OF CHICAGO	0	28
INTERNATIONAL CREATIVE CAPITAL LLC	11	1
INTERNATIONAL MICHIGAN INVESTMENTS RC	38	22
INVEST IDAHO REGIONAL CENTER	0	1
INVEST L.A. REGIONAL CENTER, LLC	76	5
INVEST U.S. REGIONAL CENTER	0	4
JMIR TEXAS MEGA METRO REGIONAL CENTER	16	0
KANSAS BIOFUEL REGIONAL CENTER LLC	1	2
KANSAS REGIONAL CENTER LLC	7	0
KENTUCKY REGIONAL CENTER DBA MIDWEST EB-5 REGIONAL CENTER LLC	18	20

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

LAKE BUENA VISTA RC	0	2
LAM NYC EB 5 FUND REGIONAL CENTER	124	20
LAS VEGAS ECONOMIC IMPACT REGIONAL CENTER LLC	310	10
LAS VEGAS REGIONAL CENTER	590	32
LCR OVERSEAS REGIONAL CENTER	0	1
LEXIN NEW YORK REGIONAL CENTER	0	2
LIBERTY NEBRASKA REGIONAL CENTER	23	1
LIBERTY WEST REGIONAL CENTER	0	10
LIGHTSTONE NEW YORK REGIONAL CENTER LLC	159	4
LIGTT REGIONAL CENTER LLC	0	2
LION S REGIONAL CENTER LLC	138	7
LIVE IN AMERICA CALIFORNIA REGIONAL CENTER LLC	28	0
LIVE IN AMERICA NEW YORK REGIONAL CENTER LLC	1	14
LOCAL GOVERNMENT REGIONAL CENTER OF ILLINOIS, LLC	22	1
LOS ANGELES REGIONAL CENTER	0	21
LUBERT ADLER NORTHEAST REGIONAL CENTER LLC	53	2
LUCA ENERGY FUND LLC	2	12
M&D REGIONAL CENTER LLC	19	1
M&D REGIONAL CENTER, LLC	361	28
MANHATTAN REGIONAL CENTER LLC	91	30
MANHATTAN REGIONAL CENTER, LLC	35	4
MARYLAND AREA REGIONAL CENTER LLC	0	3
MARYLAND CENTER FOR FOREIGN INVESTMENT LLC	2	1
MCALLEN EB-5 REGIONAL CENTER	3	11
METROPOLITAN MILWAUKEE ASSOCIATION OF COMMERCE (MMAC)	0	1
METROPOLITAN MILWAUKEE ASSOCIATION OF COMMERCE REGIONAL CENTER	187	14
MIAMI METROPOLITAN REGIONAL CENTER LLC	15	2
MIDWEST CENTER FOR FOREIGN INVESTMENT, LLC (MCFI)	15	2
MIDWEST METROPOLITAN REGIONAL CENTER INC	15	0
MIRZAM INVESTOR GREEN CARD, LLC	20	0
MISSISSIPPI DEVELOPMENT REGIONAL CENTER LLC	107	9

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

MOUNTAIN STATES CENTER FOR FOREIGN INVESTMENT (MSCFI)	8	1
MY FLORIDA REGIONAL CENTER LLC DBA MY EB5 GREEN CARD REGIONAL CENTER	98	3
NEVADA INVESTMENT REGIONAL CENTER	0	2
NEVADA REGIONAL ECONOMIC DEVELOPMENT CENTER (NREDC)	0	1
NEW ENGLAND REGIONAL CENTER FOR ECONOMIC DEVELOPMENT INC	100	10
NEW FORTUNE GLOBAL LLC	40	4
NEW HAMPSHIRE EB5 REGIONAL CENTER LLC	37	10
NEW JERSEY EB 5 REGIONAL CENTER LLC	13	0
NEW ORLEANS & GULF COAST REGIONAL CENTER LLC	1	0
NEW ORLEANS' MAYOR'S OFFICE RC	0	2
NEW WORLD REGIONAL CENTER	310	4
NEW YORK CITY REAL ESTATE REGIONAL CENTER LLC	24	6
NEW YORK CITY REGIONAL CENTER	705	38
NEW YORK CITY REGIONAL CENTER, LLC	63	3
NEW YORK GOLDWATER REGIONAL CENTER LLC	0	8
NEW YORK IMMIGRATION FUND LLC	179	10
NEW YORK IMMIGRATION FUND, LLC	50	3
NEW YORK METROPOLITAN REGIONAL CENTER	415	16
NEW YORK PROTON REGIONAL CENTER	10	1
NORTH CAROLINA EAST COAST RC ECRC	6	0
NORTH DAKOTA/MINNESOTA EB5 REGIONAL CENTER	55	3
NORTH TEXAS EB-5 REGIONAL CENTER LLC	104	13
NORTHEAST OHIO RC	0	1
NORTHERN CALIFORNIA REGIONAL CENTER , LLC	1	0
NORTHERN ROCKIES REGIONAL CENTER, LLC	39	1
NY EB5 EXPRESS LLC	7	0
NYC MAYFLOWER REGIONAL CENTER INC	20	0
NYC METRO REGIONAL CENTER LLC	112	15
NYC REGIONAL CENTER INC	0	1
OHIO DEVELOPMENT REGIONAL CENTER	7	0
OIS NCA LLC	32	1

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

OMEGA FLORIDA REGIONAL CENTER LLC	4	0
ORIENTAL DOLPHINS EB5 REGIONAL CENTER	5	0
ORLANDO EB-5 INVESTMENTS REGIONAL CENTER	38	0
PACIFIC DYNASTY REGIONAL CENTER INC	7	2
PACIFIC NORTHWEST EB-5 REGIONAL CENTER (PNWERC)	41	1
PACIFIC NORTHWEST INVESTMENT RC LLC	2	0
PACIFIC NORTHWEST REGIONAL CENTER, LLC	1	0
PACIFIC PROTON THERAPY REGIONAL CENTER LLC	7	1
PALM BEACH RACEWAY LLC	0	2
PALM BEACH REGIONAL CENTER (AKA PALM BEACH INVESTMENT AND FINANCE LLC)	79	14
PANGAEA REGIONAL CENTER LLC	6	0
PATH AMERICA KINGCO, LLC	0	178
PATH AMERICA SNOCO LLC	71	3
PENNSYLVANIA DCED REGIONAL CENTER	42	6
PIDC REGIONAL CENTER	190	15
PORTLAND REGIONAL CENTER	153	11
PROSPERITY REGIONAL CENTER LLC (FORMER NAME US PROSPERITY REGIONAL CENTER LLC )	0	2
QUEENSFORT CAPITAL FLORIDA REGIONAL CENTER	3	1
RANCON REGIONAL CENTER LLC	12	0
REAL ESTATE IMMIGRATION FUND LLC	226	6
REGIONAL CENTER ENTERPRISES 1	0	24
REGIONAL CENTER MANAGEMENT LOS ANGELES	26	11
REGIONAL CENTER PROPERTIES, INC	33	1
RELATED NEW YORK CITY METRO REGIONAL CENTER LLC	1392	52
RESIDE IN AMERICA PUERTO RICO LLC	2	0
SAN FRANCISCO EB 5 REGIONAL CENTER LLC	2	0
SAN FRANCISCO REGIONAL CENTER LLC	69	8
SAN GABRIEL VALLEY REGIONAL CENTER	0	2
SEATTLE AREA REGIONAL CENTER	7	1
SEATTLE FAMILY REGIONAL CENTER, (FORMERLY SOUTHPORT HOTEL LP REGIONAL CENTER)	128	1
SEATTLE REGIONAL CENTER	614	35

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

SILVER STATE REGIONAL CENTER LLC	8	0
SOBE EB5 REGIONAL CENTER LLC	4	0
SOUTH ATLANTIC REGIONAL CENTER	14	92
SOUTH DAKOTA REGIONAL CENTER (FORMERLY SOUTH DAKOTA INTERNATIONAL BUSINESS INSTITUTE)	5	7
SOUTH FLORIDA INVESTMENT REGIONAL CENTER (SFIRC)	114	19
SOUTH WEST BIO-FUEL RC, LLC (SWBRC)	2	3
SOUTHEAST FOREIGN INVESTMENT CENTER LLC	58	4
SOUTHEAST REGIONAL CENTER LLC	26	0
SOUTHERN CALIFORNIA REGIONAL CENTER D/B/A CALIFORNIA GOLDEN FUND	37	3
SOUTHERN OPPORTUNITY REGIONAL CENTER LLC	0	1
SOUTHERN STAR REGIONAL INVESTMENT CENTER LLC	29	3
SOUTHERN STATES REGIONAL CENTER	33	1
STAR OF TEXAS REGIONAL CENTER	28	1
SUMMIT REGIONAL CENTER	0	1
SUNBELT EB 5 REGIONAL CENTER LLC	4	1
SUNBELT EB-5 REGIONAL CENTER, LLC	19	0
SUNSHINE STATE REGIONAL CENTER INC	7	0
SYNERGY CALIFORNIA GREEN HOSPITALITY REGIONAL CENTER, LLC	116	6
TEXAN REGIONAL CENTER LLC	0	1
TEXAS EB 5 REGIONAL CENTER	0	3
TEXAS GROWTH FUND REGIONAL CENTER LLC	0	2
TEXAS LONE STAR ENTERPRISES, LLC	111	6
TEXAS REGIONAL FORTUNE CENTER LLC	143	2
TEXAS URBAN TRIANGLE REGIONAL CENTER LLC	258	12
THE MID AMERICAN REGIONAL CENTER LLC	0	4
THREE STREAMS MID-ATLANTIC REGIONAL CENTER	1	5
U S IMMIGRATION FUND NJ	97	7
U S IMMIGRATION FUND NY LLC	2413	133
U S IMMIGRATION RECOVERY FUND NY	33	2
U.S. COMMERCIAL REGIONAL CENTER	67	7
UNITED STATES DEVELOPMENT LENDING CENTER LLC	7	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

UNITED VENTURE REGIONAL CENTER LLC	3	1
US EMPLOYMENT DEVELOPMENT LENDING CENTER	1	0
USA NOW REGIONAL CENTER	0	8
USLIVING REGIONAL CENTER	0	12
UTAH REGIONAL INVESTMENT FUND LLC	2	0
UTAH REGIONAL INVESTMENT FUND, LLC	10	0
VELOCITY REGIONAL CENTER LLC	7	40
VERMONT AGENCY OF COMMERCE AND COMMUNITY DEVELOPMENT REGIONAL CENTER	231	40
WASHINGTON REGIONAL CENTER	84	11
WAYLEE INVESTMENT LLC	66	1
WEST COAST REGIONAL CENTER INC	0	1
WEST MAINGATE REGIONAL CENTER LLC (FORMERLY US MAINGATE REGIONAL CENTER LLC)	16	0
WEST WASHINGTON UNITED, LLC	10	0
WESTERN FORTUNE REGIONAL CENTER LLC	1	0
WESTERN WASHINGTON REGIONAL CENTER LLC	93	3
WESTMILL MID-ATLANTIC REGIONAL CENTER LLC	19	0
WHATCOM OPPORTUNITIES RC	1	0
WISCONSIN EB5 REGIONAL CENTER LLC WERC	0	3
WISCONSIN ILLINOIS EB 5 REGIONAL CENTER INC	5	18
YARETON INVESTMENT FUNDS LLC	44	3
YK AMERICA REGIONAL CENTER LLC	183	10

**Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers**

**Dates: January 1, 2014 to May 31, 2017**

The following is a list of the number of approved and denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by regional center. These regional centers are listed in alphabetical order. The list includes only regional centers that remain designated by USCIS and that had Form I-526 approvals or denials associated with the regional center as of the date this report was generated.

This page does not represent a legal notice or investment advice of any kind. Potential investors are encouraged to seek professional advice before making any investment decisions. Form I-526 petitions may be denied for various reasons, some of which may be based on investor specific issues and not related to any project issues. Form I-526 petitioners in certain cases may file an appeal and/or a motion of an adverse decision.

This page is provided for informational purposes only. The report reflects the most updated estimated data on the number of approvals and denials available at the time the report is generated. However, if USCIS terminates a regional center's designation after the report is generated, USCIS will remove the terminated regional center's name and the associated data from the list below when the terminated regional center's name is added to the list of terminated regional centers [here](#). To report information believed to be incorrect, please email USCIS at [USCIS.ImmigrantInvestorProgram@uscis.dhs.gov](mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov). The official point of contact may also submit updates in writing to the following address:

USCIS, Immigrant Investor Program  
131 M Street NE  
3rd Floor, Mailstop 2235  
Washington, DC 20529

**Note:** You can find a list of current regional centers [here](#). USCIS plans to update this page periodically but makes no claims that the published list below is complete, timely or accurate. Any use or reliance on the information provided is strictly at your own risk. Please see [USCIS Website Policies](#) for further information.

USCIS has issued a joint advisory with the U.S. Securities and Exchange Commission (SEC), [Investor Alert: Investment Scams Exploit Immigrant Investor Program](#). The SEC offers free [investor education materials](#). For more information, visit [Investor.gov](#).

Source: Department Of Homeland Security, U.S. Citizenship and Immigration Services, Master Data File, May 31, 2017.

- List of Regional Centers Last Updated: [Date updated]
- Number of Approvals and Denials Last Updated: [Date updated]

U.S. Department of Homeland Security  
U.S. Citizenship and Immigration Services  
Immigrant Investor Program  
131 M Street, NE, MS 2235  
Washington, DC 20529



U.S. Citizenship  
and Immigration  
Services

**TO:**

Qiu Yin  
c/o Global Law Group  
600 S Lake Avenue, Suite 306  
Pasadena, CA 91106

**DATE:** March 10, 2016

**Application:** Form I-526  
**A-Number:**  
**File:** WAC1590029833

### REQUEST FOR EVIDENCE

Based upon a review of your petition and supporting documentation, U.S. Citizenship and Immigration Services (USCIS) has found that you have not established that you are eligible for the benefit you are seeking. In order to determine whether you are eligible for the benefit, USCIS requests that you submit additional evidence. The deficiencies in your petition and the evidence that USCIS is requesting are explained in the attached document.

#### See Attachment

If you reside within the United States, you must submit the requested evidence no later than 87 days from the date of this notice. If you reside outside of the United States, you must submit the requested evidence no later than 98 days from the date of this notice. USCIS is unable to grant additional time for responding to this request for evidence. *See 8 C.F.R. § 103.2(b)(8)(iv).*

You must submit all of the requested materials at one time. Submission of only some of the requested evidence will be considered a request for a decision on the record. *See 8 CFR § 103.2(b)(11).* If you do not respond by the deadline, USCIS may deny your petition as abandoned, may deny your petition based on the record, or may deny your petition for both reasons. *See 8 CFR § 103.2(b)(13)(i).*

If you reside inside the United States, your deadline for submitting a response is: **June 3, 2016.**

If you reside outside of United States, your deadline for submitting a response is: **June 14, 2016.**

Keep a photocopy of this notice for your records. If you otherwise write to us about your case, please provide a copy of this notice.

You will be notified separately about any other applications or petitions you have filed.

Please send your response to this address:

U.S. Citizenship and Immigration Services  
Immigrant Investor Program Office  
131 M Street, NE  
Mailstop 2235  
Washington, DC 20529

**IMPORTANT: RETURN THIS ORIGINAL NOTICE ON TOP OF THE REQUESTED INFORMATION AND/OR EVIDENCE LISTED ON THE ATTACHED SHEET(S).**

cc: Linda Lau, Esq.  
Global Law Group  
600 S Lake Avenue, Suite 306  
Pasadena, CA 91106

## REQUEST FOR EVIDENCE

### Form I-526, Immigrant Petition by Alien Entrepreneur LEGEND INTERNATIONAL INVESTMENT, LP

#### I. Procedural History and Commercial Enterprise Background

Ms. Qiu Yin (Petitioner) filed an Immigrant Petition by Alien Entrepreneur (Form I-526), pursuant to section 203(b)(5) of the Immigration and Nationality Act (INA) on October 27, 2014.

Petitioner asserts eligibility based on an investment in a commercial enterprise associated with American Everglow Regional Center, LLC (Regional Center) pursuant to the Immigrant Investor Program.<sup>1</sup> The Form I-526 and the evidence presented assert that Petitioner invested [REDACTED] into Legend International Investment, LP, the new commercial enterprise (NCE), on October 3, 2014. The NCE proposed to pool [REDACTED] from [REDACTED] immigrant investors. The NCE intends to construct, develop, and operate a new commercial retail center, and is located in Riverside, California. Petitioner asserts that the NCE is principally doing business within a targeted employment area (TEA).

Based upon a review of the initial record of evidence, U.S. Citizenship and Immigration Services (USCIS) concludes that Petitioner has not established eligibility for the benefit sought. To assist Petitioner in addressing the deficiencies in the record, USCIS is issuing this Request for Evidence. The deficiencies of the current record are outlined below.

#### II. Analysis of the Evidence

##### **Invested Capital was Obtained Through Lawful Means**

Any assets acquired directly or indirectly by unlawful means, such as criminal activity, will not be considered capital. 8 C.F.R. § 204.6(e). Petitioner must demonstrate by a preponderance of the evidence that the capital was his or her own and was obtained through lawful means. 8 C.F.R. § 204.6(j)(3); *see also Matter of Ho*, 22 I&N Dec. at 210. To show that the capital was his or her own, Petitioner must document the path of the funds. *Matter of Izummi*, 22 I&N Dec. at 195.

The evidence in the record does not establish that the capital which has been invested by Petitioner or which Petitioner is actively in the process of investing is capital that has been obtained through lawful means. The record contains the following evidence:

- Real Estate Sales Contract dated August 5, 2014;

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<sup>1</sup> Section 610 of Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. No. 102-395, 106 Stat. 1828 (1992), as amended by section 116 of Pub. L. No. 105-119, 111 Stat. 2440 (1997); section 402 of Pub. L. No. 106-396, 114 Stat. 1637 (2000); section 11037 of Pub. L. No. 107-273, 116 Stat. 1758 (2002); section 4 of Pub. L. No. 108-156, 117 Stat. 1944 (2003); and section 1 of Pub. L. No. 112-176, 126 Stat. 1325 (2012) (hereinafter “P.L. 102-395”).

- Personal Transfer Vouchers and Bank Statement of Petitioner's China Citic Bank account;
- Commercial Housing Sales Contract dated February 4, 2002;
- Certificate of Property Ownership dated July 15, 2003;
- Employment documentation of Petitioner's husband; and
- Gift declaration dated September 5, 2014.

Petitioner claims she received her EB-5 investment funds as a gift from her husband, Lianhong Qin, who sold his real property located at Room 3, Unit 1, 2, Building 1, No. 30, Nanmian Road, Guangming Street, Jinzhou District, Dalian City, China. Mr. Qin's income documentation demonstrates sufficient earnings to purchase the property in February 2002. However, only partial documentation has been provided supporting the transfer of property ownership from Mr. Qin to the buyer.

(b)(4) Petitioner submitted records showing the buyer agreed to purchase the property in August 2014, and transferred the agreed upon sum of RMB [REDACTED] directly to the petitioner's China Citic Bank account, ending [REDACTED]. These records, however, do not confirm ownership of the property formally transferred to the buyer. The Real Estate Sales Contract outlines the transfer process stating:

The Seller should hand over the housing ownership certificate and relevant title certificates to the Intermediary Party on the day executing the Contract, and should hand over the other documents for title transfer to the Intermediary Party within [REDACTED] days, and the Buyer should hand over the documents for title transfer to the Intermediary within [REDACTED] days since executing the Contract. Both parties promise to go to Dalian Real Estate Transaction Office (or other authorities handling housing ownership transfer) to submit the documents for title transfer within two days since both parties getting ready all the documents for title transfer.

The existing record does not demonstrate Mr. Qin completed the actions explicitly outlined in the Sales Contract. As such, USCIS cannot determine if the ownership of the property legally changed possession from Mr. Qin to the buyer.

USCIS must be able to determine that it is more likely than not that the capital which has been invested by Petitioner or which Petitioner is actively in the process of investing is capital obtained through lawful means. Accordingly, USCIS requests additional evidence to establish the lawful source of the EB-5 investment.

To determine the lawful source of Petitioner's investment funds, additional evidence is required. Petitioner must submit, as applicable, the following evidence in order to comply with 8 C.F.R. § 204.6(j)(3):

- Evidence demonstrating the property's transfer of ownership; or
- Any other evidence that overcomes the deficiencies noted above.

### **III. Conclusion**

USCIS has determined that the record does not establish eligibility for the benefit sought. Accordingly, USCIS has requested evidence to address the issues outlined above. Petitioner is not precluded, however, from submitting evidence in addition to the evidence requested by USCIS that Petitioner deems relevant to address such issues. Petitioner must prove by a preponderance of the evidence – in other words, that it is more likely than not – that Petitioner is fully qualified for the benefit sought.

If Petitioner submits updated or revised documents, please note that “[a] petitioner must establish eligibility at the time of filing; a petition cannot be approved at a future date after the petitioner becomes eligible under a new set of facts. *See Matter of Katigbak*, 14 I&N Dec. 45, 49 (Comm. 1971). Therefore, a petitioner may not make material changes to a petition that has already been filed in an effort to make an apparently deficient petition conform to [USCIS] requirements.” *Matter of Izummi*, 22 I&N Dec. 169, 175 (Assoc. Comm’r 1998); *see also* 8 C.F.R. § 103.2(b)(1).

#### **NOTES:**

*Any document submitted to USCIS containing a foreign language must be accompanied by a full English language translation that has been certified by the translator as complete and accurate, and that the translator is competent to translate from the foreign language into English. Submit clear and legible copies of all requested evidence. If clear and legible copies are not possible, submit the original documents. These originals will be returned, if requested.*

*Please provide an index of any submitted evidence and include corresponding tabs for each section of evidence.*

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**Dates: January 1, 2014 to May 31, 2017**

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Source: Department Of Homeland Security, U.S. Citizenship and Immigration Services, Master Data File, May 31, 2017.

- List of Regional Centers Last Updated: [Date updated]
- Number of Approvals and Denials Last Updated: [Date updated]

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

Regional Center	Number of Approvals	Number of Denials
168 AMERICA REGIONAL CENTER LLC	8	0
AAA CALIFORNIA REGIONAL CENTER	3	0
ACSRC, LLC	65	4
ADMIRALTY CALIFORNIA REGIONAL CENTER LLC	34	4
ADVANTAGE AMERICA CALIFORNIA REGIONAL CENTER LLC	6	3
ADVANTAGE AMERICA NEW YORK REGIONAL CENTER LLC	32	4
AERO-SPACE PORT INTERNATIONAL (ASPI) GROUP REGIONAL CENTER	10	16
AFC REGIONAL CENTER LLC (FORMERLY NEW YORK FEDERAL REGIONAL CENTER)	1	0
ALLIANCE REGIONAL CENTER	38	5
AMERICA S CENTER FOR FOREIGN INVESTMENT	71	27
AMERICAN AMBITION REGIONAL CENTER CHICAGO LLC	43	1
AMERICAN BUILDERS REGIONAL CENTER LLC	0	1
AMERICAN EVERGLOW REGIONAL CENTER LLC	20	1
AMERICAN FRANCHISE REGIONAL CENTER LLC	12	1
AMERICAN GATEWAY REGIONAL CENTERS LLC	108	4
AMERICAN INVESTMENT AND IMMIGRATION CENTER LLC	6	2
AMERICAN LENDING CENTER LLC (FORMERLY UNITED STATES EMPLOYMENT DEVELOPMENT LENDING CENTER)	71	27
AMERICAN LIBERTY REGIONAL CENTER LLC	15	0
AMERICAN LIFE DEVELOPMENT COMPANY LLC (FORMERLY RIVERSIDE PUMA AREA RC)	7	42
AMERICAN LIFE, INC. - LAKWOOD REGIONAL CENTER	47	0
AMERICAN LIFE, INC. REGIONAL CENTER - SEATTLE (GOLDEN RAINBOW & GATEWAY FREEDOM FUND)	296	15
AMERICAN LOGISTICS [INTERNATIONAL] REGIONAL CENTER	1	40
AMERICAN NORTHERN MARIANAS REGIONAL CENTER	45	0
AMERICAN NW REGIONAL CENTER LLC	35	3
AMERICAN OIL	30	0
AMERICAN PATHWAY REGIONAL CENTER LLC	3	2
AMERICAN REDEVELOPMENT REGIONAL CENTER	134	11
AMERICAN REGIONAL CENTER	2	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

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AMERICAN REGIONAL CENTER FOR ENTERPRENEURS	68	5
AMERICAN REGIONAL CENTER FOR ENTREPRENEURS INC	114	2
AMERICAN UNITED EB 5 REGIONAL CENTER	167	4
AMERICAN VANTAGE REGIONAL CENTER	4	0
AMERICAN VENTURE SOLUTIONS REGIONAL CENTER LLC	30	3
AMERICAN YIYO REGIONAL CENTER	0	1
AMERICA'S CENTER FOR FOREIGN INVESTMENT, LLC	14	2
AMWEALTH LP	66	6
APPALACHIAN EB 5 REGIONAL CENTER	89	20
ARCG FLORIDA REGIONAL CENTER LLC	0	1
ARCG NEVADA REGIONAL CENTER LLC (FORMERLY GEOTHERMAL REGIONAL CENTER LLC)	0	3
ASCENDAMERICA LLC	12	0
ATLANTA EB5 REGIONAL CENTER LLC	30	2
ATLANTIC CITY REGIONAL CENTER	71	1
ATLANTIC REGIONAL CENTER FOR FOREIGN INVESTMENT LLC	85	18
BERKELEY REGIONAL CENTER	10	0
BIRCHLEAF MIAMI 31, LLC	1	0
CALIFORNIA CONSORTIUM FOR AGRICULTURAL EXPORT (CCAE)	3	2
CALIFORNIA ENERGY INVESTMENT CENTER	253	21
CALIFORNIA FOREIGN INVESTMENT AND IMMIGRATION CENTER LLC	23	0
CALIFORNIA GLOBAL ALLIANCE LLC	1	1
CALIFORNIA GOLDEN PACIFIC REGIONAL CENTER LLC (FORMERLY US GOLDEN PACIFIC REGIONAL CENTER LLC)	2	0
CALIFORNIA GREENHOUSE FARM REGIONAL CENTER	26	0
CALIFORNIA INTERNATIONAL REGIONAL CENTER LLC	5	0
CALIFORNIA INVESTMENT IMMIGRATION FUND, LLC	0	32
CALIFORNIA MILITARY BASES (CMB) EXPORT LLC	931	12
CALIFORNIA ONE INVESTMENT CENTER LLC	2	0
CALIFORNIA PACIFIC GROUP REGIONAL CENTER LLC	8	4
CALIFORNIA REAL ESTATE REGIONAL CENTER LLC	104	4
CALIFORNIA REGIONAL CENTER LLC	17	1
CALIFORNIA WINERIES & VINEYARDS, LLC REGIONAL CENTER	2	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

CANAM FLORIDA REGIONAL CENTER LLC	0	4
CANAM LOS ANGELES COUNTY REGIONAL CENTER, LLC (FORMER NAME LOS ANGELES FILM REGIONAL CENTER)	87	108
CAPITAL AREA REGIONAL CENTER™ (CARC™)	21	2
CAROLINA CENTER FOR FOREIGN INVESTMENT LLC	11	0
CAROLINA GLOBAL REGIONAL CENTER CORP	0	1
CAROLINA GROWTH REGIONAL CENTER LLC	149	3
CAROLINA STATES REGIONAL CENTER LLC	12	0
CENTRAL ARIZONA REGIONAL CENTER	45	243
CENTRAL WESTERN REGIONAL CENTER LLC (FORMERLY USA MIDWEST REGIONAL CENTER LLC)	0	3
CENTURY AMERICAN REGIONAL CENTER	252	30
CHARLOTTE HARBOR REGIONAL CENTER, LLC	5	4
CHESAPEAKE REGIONAL CENTER	95	2
CHICAGOLAND FOREIGN INVESTMENT GROUP (CFIG) REGIONAL CENTER	74	83
CITY OF DALLAS RC (CDRC)	25	4
CITY OF DALLAS REGIONAL CENTER	284	17
CITY OF DALLAS REGIONAL CENTER CDRC	9	0
CIVITAS EL PASO REGIONAL CENTER	5	6
CIVITAS NEW YORK REGIONAL CENTER	63	7
CIVITAS SOCAL REGIONAL CENTER	27	1
CIVITAS TEXAS REGIONAL CENTER	188	7
CLARK COUNTY REGIONAL CENTER	2	0
CLEARWATER BEACH RESORT REGIONAL CENTER	5	0
CLEVELAND INTERNATIONAL FUND LTD	232	8
CLOUDSEED INTERNATIONAL FUND LLC	2	1
CMB EXPORT LLC	1363	97
CMB ILLINOIS REGIONAL CENTER LLC	48	5
CMB PENNSYLVANIA REGIONAL CENTER LLC	185	3
CMB SOUTHEAST REGIONAL CENTER LLC	23	1
CMB SUMMIT LLC	113	20
CMB TEXAS LLC	282	8
COLORADO INTERCONTINENTAL REGIONAL CENTER, LLC	16	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

COLORADO REGIONAL CENTER LLC	4	0
CONTINENTAL REGIONAL CENTER LLC (FORMERLY USA CONTINENTAL REGIONAL CENTER, LLC)	44	3
CORSARIO NEW YORK METRO REGIONAL CENTER LLC	0	1
CP REGIONAL CENTER	128	3
CP TENNESSEE REGIONAL CENTER INC DBA CP SOUTHERN REGIONAL CENTER	3	0
CROWN POINT REGIONAL CENTER, LLC	2	1
DC REGIONAL CENTER	548	28
DELAWARE VALLEY REGIONAL CENTER	421	7
DOS LAGOS REGIONAL CENTER, LLC	51	1
EASTERN WASHINGTON REGIONAL CENTER LLC	1	0
EB 5 AMERI HOLDINGS LLC	1	0
EB 5 FUND REGIONAL CENTER	51	0
EB 5 IMPACT CAPITAL REGIONAL CENTER LLC	0	1
EB 5 JOBS FOR MASSACHUSETTS INC	18	2
EB 5 NEW YORK STATE LLC	0	1
EB5 AFFILIATE NETWORK STATE OF ARIZONA REGIONAL CENTER LLC	0	6
EB5 AFFILIATE NETWORK STATE OF FLORIDA REGIONAL CENTER LLC	14	0
EB5 CAPITAL CALIFORNIA REGIONAL CENTER	43	5
EB5 CAPITAL- DC REGIONAL CENTER	87	10
EB5 CAPITAL NEW YORK REGIONAL CENTER	0	1
EB5 FINANCING MANAGEMENT COMPANY LLC	0	2
EB5 FLORIDA REAL ESTATE REGIONAL CENTER LLC	1	0
EB-5 JOBS FOR MASSACHUSETTS, INC.	79	1
EB-5 NEW YORK STATE LLC (FORMERLY : UPSTATE NEW YORK REGIONAL CENTER (UNYRC))	42	3
EB-5 NEW YORK STATE, LLC (FORMERLY UPSTATE NEW YORK REGIONAL RC, LLC)	51	27
EB5 OPPORTUNITIES FUND LLC	7	2
EB5 REGIONAL CENTER OF AMERICA LLC	0	39
EB5 UNITED WEST REGIONAL CENTER LLC	0	9
EB5 WEST LLC	2	0
EMPIRE STATE EB5 REGIONAL CENTER LLC	7	0
ENCORE MISSISSIPPI REGIONAL CENTER	5	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

ENCORE MISSISSIPPI REGIONAL CENTER EMRC	1	0
ENCORE TEXAS RC LLC ETRC	24	0
EXTELL NEW YORK REGIONAL CENTER LLC	269	40
FARM FOR AMERICA REGIONAL CENTER	32	12
FDIUS REGIONAL CENTER	7	0
FLEET NEW YORK METROPOLITAN REGIONAL CENTER LLC (FKA FEDERAL NEW YORK METROPOLITAN REGIONAL CENTER)	212	1
FLORIDA EB5 INVESTMENTS LLC REGIONAL CENTER	328	149
FLORIDA EB-5 REGIONAL CENTER LLC	35	2
FLORIDA EB-5 REGIONAL CENTER, LLC	13	0
FLORIDA EQUITY & GROWTH FUND REGIONAL CENTER(FEGF-RC)	20	0
FLORIDA EQUITY AND GROWTH FUND REGIONAL CENTER LLC	57	11
FLORIDA GATEWAY REGIONAL CENTER LLC	0	5
FLORIDA OVERSEAS INVESTMENT CENTER	319	30
FLORIDA OVERSEAS INVESTMENT CENTER RC	148	11
FLORIDA REGIONAL CENTER, LLC	276	14
FRISCO TEXAS INTERNATIONAL DEVELOPMENT CENTER	74	1
GEORGIA CENTER FOR FOREIGN INVESTMENT AND DEVELOPMENT, GCFID LLC	25	18
GEORGIA REGIONAL CENTER, LLC	113	1
GLOBAL PREMIER AMERICA REGIONAL CENTER	52	4
GO EB5 RC REGIONAL CENTER, LLC (FORMERLY GO USA EB-5 REGIONAL CENTER LLC)	8	0
GOLD COAST FLORIDA REGIONAL CENTER, LLC	153	23
GOLDEN CALIFORNIA REGIONAL CENTER	19	1
GOLDEN LAMP REGIONAL CENTER (FORMER NAME UTAH HIGH COUNTRY REGIONAL CENTER INC)	31	0
GOLDEN OPPORTUNITY REGIONAL CENTER	9	2
GOLDEN PACIFIC VENTURES REGIONAL CENTER	1	0
GOLDEN STATE REGIONAL CENTER	78	2
GOLDEN STATE RENAISSANCE VENTURES LLC DBA GOLDEN GATE GLOBAL	576	20
GOTHAM CITY REGIONAL CENTER LLC	477	77
GRAND CANYON REGIONAL CENTER, LLC	132	11
GREAT OCEAN REGIONAL CENTER LLC AKA GREAT OCEAN CAPITAL HOLDING LLC	2	0
GREAT TEXAS REGIONAL CENTER LLC	28	12

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

GREATER NEW YORK REGIONAL CENTER LLC	40	0
GREEN CARD FUND, LLC	125	13
GREEN DETROIT REGIONAL CENTER LLC	25	1
GREEN DETROIT REGIONAL CENTER, LLC	0	1
GREEN ENERGY REGIONAL CENTER, LLC (GERC)	8	2
GULF COAST FUNDS MANAGEMENT LLC	19	129
GULF COAST REGIONAL INVESTMENT CENTER, LLC	107	2
GULF COAST RENEWABLE & REDEVELOPMENT LLC A REGIONAL CENTER	5	0
GULF STATES REGIONAL CENTER LLC	117	8
HAWAII REGIONAL CENTER	150	10
HAWAIIAN ISLANDS REGIONAL CENTER	34	1
HOLLYWOOD BEACH REGIONAL CENTER LLC	0	1
HOLLYWOOD INTERNATIONAL REGIONAL CENTER	212	6
HOLLYWOOD REGIONAL CENTER	0	1
HOME PARADISE REGIONAL CENTER	460	10
HOUSTON EB 5 REGIONAL CENTER	9	0
HOUSTON EB5 REGIONAL CENTER (FORMERLY DC PARTNERS REGIONAL CENTER)	43	4
ICONIC CARIBBEAN EB 5 LLC	89	2
IDAHO STATE REGIONAL CENTER	2	155
IMPERIAL REGIONAL CENTER	55	0
INLAND EMPIRE RENEWABLE ENERGY REGIONAL CENTER	76	0
INTERCONTINENTAL REGIONAL CENTER TRUST OF CHICAGO	0	28
INTERNATIONAL CREATIVE CAPITAL LLC	11	1
INTERNATIONAL MICHIGAN INVESTMENTS RC	38	22
INVEST IDAHO REGIONAL CENTER	0	1
INVEST L.A. REGIONAL CENTER, LLC	76	5
INVEST U.S. REGIONAL CENTER	0	4
JMIR TEXAS MEGA METRO REGIONAL CENTER	16	0
KANSAS BIOFUEL REGIONAL CENTER LLC	1	2
KANSAS REGIONAL CENTER LLC	7	0
KENTUCKY REGIONAL CENTER DBA MIDWEST EB-5 REGIONAL CENTER LLC	18	20

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

LAKE BUENA VISTA RC	0	2
LAM NYC EB 5 FUND REGIONAL CENTER	124	20
LAS VEGAS ECONOMIC IMPACT REGIONAL CENTER LLC	310	10
LAS VEGAS REGIONAL CENTER	590	32
LCR OVERSEAS REGIONAL CENTER	0	1
LEXIN NEW YORK REGIONAL CENTER	0	2
LIBERTY NEBRASKA REGIONAL CENTER	23	1
LIBERTY WEST REGIONAL CENTER	0	10
LIGHTSTONE NEW YORK REGIONAL CENTER LLC	159	4
LIGTT REGIONAL CENTER LLC	0	2
LION S REGIONAL CENTER LLC	138	7
LIVE IN AMERICA CALIFORNIA REGIONAL CENTER LLC	28	0
LIVE IN AMERICA NEW YORK REGIONAL CENTER LLC	1	14
LOCAL GOVERNMENT REGIONAL CENTER OF ILLINOIS, LLC	22	1
LOS ANGELES REGIONAL CENTER	0	21
LUBERT ADLER NORTHEAST REGIONAL CENTER LLC	53	2
LUCA ENERGY FUND LLC	2	12
M&D REGIONAL CENTER LLC	19	1
M&D REGIONAL CENTER, LLC	361	28
MANHATTAN REGIONAL CENTER LLC	91	30
MANHATTAN REGIONAL CENTER, LLC	35	4
MARYLAND AREA REGIONAL CENTER LLC	0	3
MARYLAND CENTER FOR FOREIGN INVESTMENT LLC	2	1
MCALLEN EB-5 REGIONAL CENTER	3	11
METROPOLITAN MILWAUKEE ASSOCIATION OF COMMERCE (MMAC)	0	1
METROPOLITAN MILWAUKEE ASSOCIATION OF COMMERCE REGIONAL CENTER	187	14
MIAMI METROPOLITAN REGIONAL CENTER LLC	15	2
MIDWEST CENTER FOR FOREIGN INVESTMENT, LLC (MCFI)	15	2
MIDWEST METROPOLITAN REGIONAL CENTER INC	15	0
MIRZAM INVESTOR GREEN CARD, LLC	20	0
MISSISSIPPI DEVELOPMENT REGIONAL CENTER LLC	107	9

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

MOUNTAIN STATES CENTER FOR FOREIGN INVESTMENT (MSCFI)	8	1
MY FLORIDA REGIONAL CENTER LLC DBA MY EB5 GREEN CARD REGIONAL CENTER	98	3
NEVADA INVESTMENT REGIONAL CENTER	0	2
NEVADA REGIONAL ECONOMIC DEVELOPMENT CENTER (NREDC)	0	1
NEW ENGLAND REGIONAL CENTER FOR ECONOMIC DEVELOPMENT INC	100	10
NEW FORTUNE GLOBAL LLC	40	4
NEW HAMPSHIRE EB5 REGIONAL CENTER LLC	37	10
NEW JERSEY EB 5 REGIONAL CENTER LLC	13	0
NEW ORLEANS & GULF COAST REGIONAL CENTER LLC	1	0
NEW ORLEANS' MAYOR'S OFFICE RC	0	2
NEW WORLD REGIONAL CENTER	310	4
NEW YORK CITY REAL ESTATE REGIONAL CENTER LLC	24	6
NEW YORK CITY REGIONAL CENTER	705	38
NEW YORK CITY REGIONAL CENTER, LLC	63	3
NEW YORK GOLDWATER REGIONAL CENTER LLC	0	8
NEW YORK IMMIGRATION FUND LLC	179	10
NEW YORK IMMIGRATION FUND, LLC	50	3
NEW YORK METROPOLITAN REGIONAL CENTER	415	16
NEW YORK PROTON REGIONAL CENTER	10	1
NORTH CAROLINA EAST COAST RC ECRC	6	0
NORTH DAKOTA/MINNESOTA EB5 REGIONAL CENTER	55	3
NORTH TEXAS EB-5 REGIONAL CENTER LLC	104	13
NORTHEAST OHIO RC	0	1
NORTHERN CALIFORNIA REGIONAL CENTER , LLC	1	0
NORTHERN ROCKIES REGIONAL CENTER, LLC	39	1
NY EB5 EXPRESS LLC	7	0
NYC MAYFLOWER REGIONAL CENTER INC	20	0
NYC METRO REGIONAL CENTER LLC	112	15
NYC REGIONAL CENTER INC	0	1
OHIO DEVELOPMENT REGIONAL CENTER	7	0
OIS NCA LLC	32	1

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

OMEGA FLORIDA REGIONAL CENTER LLC	4	0
ORIENTAL DOLPHINS EB5 REGIONAL CENTER	5	0
ORLANDO EB-5 INVESTMENTS REGIONAL CENTER	38	0
PACIFIC DYNASTY REGIONAL CENTER INC	7	2
PACIFIC NORTHWEST EB-5 REGIONAL CENTER (PNWERC)	41	1
PACIFIC NORTHWEST INVESTMENT RC LLC	2	0
PACIFIC NORTHWEST REGIONAL CENTER, LLC	1	0
PACIFIC PROTON THERAPY REGIONAL CENTER LLC	7	1
PALM BEACH RACEWAY LLC	0	2
PALM BEACH REGIONAL CENTER (AKA PALM BEACH INVESTMENT AND FINANCE LLC)	79	14
PANGAEA REGIONAL CENTER LLC	6	0
PATH AMERICA KINGCO, LLC	0	178
PATH AMERICA SNOCO LLC	71	3
PENNSYLVANIA DCED REGIONAL CENTER	42	6
PIDC REGIONAL CENTER	190	15
PORTLAND REGIONAL CENTER	153	11
PROSPERITY REGIONAL CENTER LLC (FORMER NAME US PROSPERITY REGIONAL CENTER LLC )	0	2
QUEENSFORT CAPITAL FLORIDA REGIONAL CENTER	3	1
RANCON REGIONAL CENTER LLC	12	0
REAL ESTATE IMMIGRATION FUND LLC	226	6
REGIONAL CENTER ENTERPRISES 1	0	24
REGIONAL CENTER MANAGEMENT LOS ANGELES	26	11
REGIONAL CENTER PROPERTIES, INC	33	1
RELATED NEW YORK CITY METRO REGIONAL CENTER LLC	1392	52
RESIDE IN AMERICA PUERTO RICO LLC	2	0
SAN FRANCISCO EB 5 REGIONAL CENTER LLC	2	0
SAN FRANCISCO REGIONAL CENTER LLC	69	8
SAN GABRIEL VALLEY REGIONAL CENTER	0	2
SEATTLE AREA REGIONAL CENTER	7	1
SEATTLE FAMILY REGIONAL CENTER, (FORMERLY SOUTHPORT HOTEL LP REGIONAL CENTER)	128	1
SEATTLE REGIONAL CENTER	614	35

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

SILVER STATE REGIONAL CENTER LLC	8	0
SOBE EB5 REGIONAL CENTER LLC	4	0
SOUTH ATLANTIC REGIONAL CENTER	14	92
SOUTH DAKOTA REGIONAL CENTER (FORMERLY SOUTH DAKOTA INTERNATIONAL BUSINESS INSTITUTE)	5	7
SOUTH FLORIDA INVESTMENT REGIONAL CENTER (SFIRC)	114	19
SOUTH WEST BIO-FUEL RC, LLC (SWBRC)	2	3
SOUTHEAST FOREIGN INVESTMENT CENTER LLC	58	4
SOUTHEAST REGIONAL CENTER LLC	26	0
SOUTHERN CALIFORNIA REGIONAL CENTER D/B/A CALIFORNIA GOLDEN FUND	37	3
SOUTHERN OPPORTUNITY REGIONAL CENTER LLC	0	1
SOUTHERN STAR REGIONAL INVESTMENT CENTER LLC	29	3
SOUTHERN STATES REGIONAL CENTER	33	1
STAR OF TEXAS REGIONAL CENTER	28	1
SUMMIT REGIONAL CENTER	0	1
SUNBELT EB 5 REGIONAL CENTER LLC	4	1
SUNBELT EB-5 REGIONAL CENTER, LLC	19	0
SUNSHINE STATE REGIONAL CENTER INC	7	0
SYNERGY CALIFORNIA GREEN HOSPITALITY REGIONAL CENTER, LLC	116	6
TEXAN REGIONAL CENTER LLC	0	1
TEXAS EB 5 REGIONAL CENTER	0	3
TEXAS GROWTH FUND REGIONAL CENTER LLC	0	2
TEXAS LONE STAR ENTERPRISES, LLC	111	6
TEXAS REGIONAL FORTUNE CENTER LLC	143	2
TEXAS URBAN TRIANGLE REGIONAL CENTER LLC	258	12
THE MID AMERICAN REGIONAL CENTER LLC	0	4
THREE STREAMS MID-ATLANTIC REGIONAL CENTER	1	5
U S IMMIGRATION FUND NJ	97	7
U S IMMIGRATION FUND NY LLC	2413	133
U S IMMIGRATION RECOVERY FUND NY	33	2
U.S. COMMERCIAL REGIONAL CENTER	67	7
UNITED STATES DEVELOPMENT LENDING CENTER LLC	7	0

Number of Approved and Denied Forms I-526, Immigrant Petitions by Alien Entrepreneur, by USCIS Designated Regional Centers

Dates: January 1, 2014 to May 31, 2017

UNITED VENTURE REGIONAL CENTER LLC	3	1
US EMPLOYMENT DEVELOPMENT LENDING CENTER	1	0
USA NOW REGIONAL CENTER	0	8
USLIVING REGIONAL CENTER	0	12
UTAH REGIONAL INVESTMENT FUND LLC	2	0
UTAH REGIONAL INVESTMENT FUND, LLC	10	0
VELOCITY REGIONAL CENTER LLC	7	40
VERMONT AGENCY OF COMMERCE AND COMMUNITY DEVELOPMENT REGIONAL CENTER	231	40
WASHINGTON REGIONAL CENTER	84	11
WAYLEE INVESTMENT LLC	66	1
WEST COAST REGIONAL CENTER INC	0	1
WEST MAINGATE REGIONAL CENTER LLC (FORMERLY US MAINGATE REGIONAL CENTER LLC)	16	0
WEST WASHINGTON UNITED, LLC	10	0
WESTERN FORTUNE REGIONAL CENTER LLC	1	0
WESTERN WASHINGTON REGIONAL CENTER LLC	93	3
WESTMILL MID-ATLANTIC REGIONAL CENTER LLC	19	0
WHATCOM OPPORTUNITIES RC	1	0
WISCONSIN EB5 REGIONAL CENTER LLC WERC	0	3
WISCONSIN ILLINOIS EB 5 REGIONAL CENTER INC	5	18
YARETON INVESTMENT FUNDS LLC	44	3
YK AMERICA REGIONAL CENTER LLC	183	10



May 2, 2017

**Via FedEx (Tracking Number: 7789 3463 7665)**

U.S. Citizenship and Immigration Services  
Immigrant Investor Program Office  
131 M Street, NE  
Mailstop 2235  
Washington, DC 20529

**Please update Counsel's address to**  
**600 S Lake Avenue, Suite 306,**  
**Pasadena, CA 91106**

**RE: Request to Withdraw Form I-924 Application**

**Regional Center Name:** American Everglow Regional Center, LLC  
**New Commercial Enterprise:** Bloomage Villa Fund, LP  
**Receipt Number:** RCW 1527153015

Dear Sir/Madam:

Our office is the attorney of record in the pending Form I-924 regional center amendment application with actual project application (the "Application") referenced above, and our G-28 is on file with the USCIS. Kindly please update our office address as we have moved. The new address is 600 S. Lake Avenue, Suite 306, Pasadena, CA 91106.

This letter serves as a formal request to withdraw the above referenced I-924 application with receipt number referenced above. Attached please find American Everglow Regional Center, LLC's written request to withdraw the Form I-924 amendment with receipt number RCW 1527153015 (**Exhibit 1**). The withdrawal of the Application will also serve as the response to the Notice of Intent to Deny issued by USCIS on April 3, 2017, which is also attached (**Exhibit 2**). Kindly provide confirmation that this Application has been withdrawn.

Thank you for your kind assistance in this matter. Please do not hesitate to contact us should you have any questions.

Sincerely,

Linda Lau, Esq.  
*Enclosures*

Page 1

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**Exhibit 1      American Everglow Regional Center, LLC's Written Request to Withdraw  
the Form I-924 Amendment with Original Signature**

## Affidavit

1. I, Hua GUO, the Principal, Member, and Manager of American Everglow Regional Center, LLC. submitted a Form I-924, Amendment to an Approved Regional Center Application with an actual project application. The application was received by USCIS on September 28, 2015, with I-924 receipt number RCW1527153015.
2. I hereby state that I am withdrawing the above I-924 Application on behalf of American Everglow Regional Center, LLC. Please take no further action with respect to the adjudication of the Application.



Hua GUO (Signature)

4/19/2017

Date

**Exhibit 2      USCIS' Notice of Intent to Deny**

U.S. Department of Homeland Security  
U.S. Citizenship and Immigration Services  
Immigrant Investor Program  
131 M Street, NE, MS 2235  
Washington, DC 20529



U.S. Citizenship  
and Immigration  
Services

**TO:**

Linda Lau / Helyn Lau / Yu Han Shu  
Global Law Group  
600 S Lake Ave, Suite 306  
Pasadena, CA 91106

**DATE:** April 3, 2017

**Application:** Form I-924  
Amendment

**File:** RCW1527153015

**NOTICE OF INTENT TO DENY**

Based upon a review of the Form I-924 application and supporting documentation, U.S. Citizenship and Immigration Services (USCIS) has found that eligibility for the benefit requested as not been established. USCIS requests that the applicant submit additional evidence. The deficiencies in the application and the evidence that USCIS is requesting are explained in the attached document.

**See Attachment**

The applicant must submit the requested evidence no later than 33 days from the date of this notice. USCIS is unable to grant additional time for responding to this request for evidence. *See* 8 C.F.R. § 103.2(b)(8)(iv).

You must submit all of the requested materials at one time. Submission of only some of the requested evidence will be considered a request for a decision on the record. *See* 8 CFR § 103.2(b)(11). If you do not respond by the deadline, USCIS may deny the application as abandoned, may deny the application based on the record, or may deny the application for both reasons. *See* 8 CFR § 103.2(b)(13)(i).

The deadline for submitting a response is: **May 6, 2017**.

Keep a photocopy of this notice for your records, and provide a copy with any future correspondence related to this application.

Please send the response to this address:

U.S. Citizenship and Immigration Services  
Immigrant Investor Program Office  
131 M Street, NE  
Mailstop 2235  
Washington, DC 20529

**IMPORTANT: RETURN THIS ORIGINAL NOTICE ON TOP OF THE REQUESTED INFORMATION AND/OR EVIDENCE LISTED ON THE ATTACHED SHEET(S).**

cc: American Everglow Regional Center, LLC  
Hua Guo  
3626 West Devonshire Avenue, Suite 907  
Hemet, CA 92545

## NOTICE OF INTENT TO DENY

### Form I-924, Application for Regional Center Designation Under the Immigrant Investor Program *American Everglow Regional Center*

#### I. Procedural History

On September 28, 2015, American Everglow Regional Center, LLC ("AERC" or the "the Regional Center") filed a Form I-924 to request an amendment to its regional center designation. Specifically, the Form I-924 requests the following:

- Preliminary determination of EB-5 compliance for an actual project for a new commercial enterprise; and

The Regional Center entity was established on October 2, 2013 in California, and is structured as a LLC. The Regional Center was initially approved for designation in the Immigrant Investor Program ("the Program")<sup>1</sup> on February 18, 2014. Based on the initial designation and any subsequently approved amendments, the Regional Center has jurisdiction over the following geographic area:

State	Counties	Date Approved
California	Los Angeles	February 18, 2014
	Orange	
	Riverside	
	San Bernardino	

The Regional Center has or plans to offer EB-5 capital investment opportunities in affiliated new commercial enterprises focusing on projects in the following industry categories:

Industry Category(ies)	NAICS
Restaurants and Other Eating Places	7225
Nonresidential Building Construction	2362
Furniture and Home Furnishing Merchant Wholesalers	4232
Professional and Commercial Equipment Wholesalers	4234
Food and Beverage Stores	445
Traveler Accommodation	7211

<sup>1</sup> Section 610 of Departments of Commerce, Justice, and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. No. 102-395, 106 Stat. 1828 (1992), as amended (hereinafter the "Act").

Through this Form I-924 and the documents submitted, the Regional Center requests an actual project. With respect to the Regional Center's request for approval of an actual project for a new commercial enterprise, and documents submitted for consideration and approval of the project for later deference, USCIS notes that Bloomage Villa Fund, LP, the new commercial enterprise ("NCE"), proposes to pool up to [REDACTED] from [REDACTED] immigrant investors. The NCE will lend the entire amount to the job-creating entity ("JCE"), which will use the pooled investment to construct and operate a portion of Villa de Madrid in Hemet, CA, consisting of 17 townhouse buildings with 78 residential units (the "Project").

(b)(4)

Based upon a review of the initial record of evidence, United States Citizenship and Immigration Services ("USCIS") could not conclude that the Regional Center has demonstrated that it meets the relevant requirements for the changes requested. On December 6, 2016, USCIS issued a Request for Evidence (RFE) which identified deficiencies in the record with regard to the following:

- Deficiencies with the Actual Project; specifically, the business plan.

On March 2, 2017, the applicant responded to the RFE with the submission of additional evidence. Following a review of the applicant's response to the RFE, USCIS intends to deny the application for reasons discussed below.

## II. Analysis

### A. Preliminary Determination of EB-5 Compliance for an Actual Project

USCIS policy allows regional centers to submit documents for consideration and approval for later deference, either pertaining to an "actual project" or an "exemplar Form I-526". An actual project refers to a specific project proposal that is supported by a *Matter of Ho* compliant business plan. *See Matter of Ho*, 22 I&N Dec. 206 (Assoc. Comm'r 1998). The term "exemplar" refers to a sample Form I-526 petition, filed with a Form I-924 actual project proposal that contains copies of the commercial enterprise's organizational and transactional documents, which USCIS will review to determine if they are in compliance with established EB-5 eligibility requirements.

Determinations based on actual projects, including those supported by a Form I-526 exemplar, will be accorded deference to subsequent filings under the project involving the same material facts and issues. Applicants may also choose to file an amended Form I-924 application with a Form I-526 exemplar in order to obtain a favorable determination which will be accorded deference in subsequent related filings, absent material change, fraud, willful misrepresentation, or a legally deficient determination.

The Regional Center requests preliminary determination of EB-5 compliance for an actual project.

After review of the documents submitted in connection with this amendment, USCIS cannot determine that the Regional Center has demonstrated that the actual project complies with EB-5 requirements. The specific deficiencies are described below.

***1. Job Creation***

As required by 8 C.F.R. § 204.6(j)(4)(i), a Form I-526 petition must establish that the investment of the required amount of capital in a new commercial enterprise will create full-time positions for at least ten qualifying employees within 2 years. *See also* 8 U.S.C. § 1153(b)(5)(A)(ii). For purposes of the Form I-526 adjudication and the job creation requirements, the two-year period described in 8 C.F.R. § 204.6(j)(4)(i)(B) is deemed to commence six months after the adjudication of the Form I-526.

According to 8 C.F.R. § 204.6(j)(4)(i), to show that a new commercial enterprise will create full-time positions for at least ten qualifying employees within two years, the petition must be accompanied by:

- (A) Documentation consisting of photocopies of relevant tax records, Forms I-9, or other similar documents for 10 qualifying employees, if such employees have already been hired following the establishment of the new commercial enterprise; or
- (B) A copy of a comprehensive business plan showing that, due to the nature and projected size of the NCE, the need for at least 10 qualifying employees will result, including approximate dates, within the next two years, and when such employees will be hired.

For a new commercial enterprise within a regional center, the full-time positions can be created either directly or indirectly by the new commercial enterprise. 8 C.F.R. §§ 204.6(e), (j)(4)(iii). Investors investing within a regional center are subject to all the same program requirements except that they may rely on indirect job creation as demonstrated through reasonable methodologies, including those set forth in 8 C.F.R. § 204.6(m)(3). 8 C.F.R. §§ 204.6(j)(4)(iii), (m)(1), (7).

**a. Comprehensive Business Plan**

When the jobs have not already been created, the regulations require EB-5 petitioners to submit a comprehensive business plan demonstrating the need for at least 10 employees within the next two years. *Matter of Ho* explained that a comprehensive business plan must be sufficiently detailed to permit USCIS to draw reasonable inferences about job-creation potential. 22 I&N Dec. at 213. Additionally, *Matter of Ho* held that a “comprehensive business plan as contemplated by the regulations should contain, at a minimum, a description of the business, its products and/or services, and its objectives.” *Id.* The decision further states:

The plan should contain a market analysis, including the names of competing businesses and their relative strengths and weaknesses, a comparison of the competition’s products

and pricing structures, and a description of the target market/prospective customers of the new commercial enterprise. The plan should list the required permits and licenses obtained. If applicable, it should describe the manufacturing or production process, the materials required, and the supply sources. The plan should detail any contracts executed for the supply of materials and/or the distribution of products. It should discuss the marketing strategy of the business, including pricing, advertising, and servicing. The plan should set forth the business's organizational structure and its personnel's experience. It should explain the business's staffing requirements and contain a timetable for hiring, as well as job descriptions for all positions. It should contain sales, cost, and income projections and detail the bases therefor.<sup>2</sup> Most importantly, the business plan must be credible.

*Id.*

Upon reviewing the business plan, USCIS finds that the evidence in the record does not establish that the business plan is *Matter of Ho*-compliant. USCIS must be able to determine that it is more likely than not that the business plan is comprehensive and credible. Accordingly, USCIS notes that the issues listed below do not support the notion that the business plan is both comprehensive and credible.

### Projections

#### *Project Costs*

In the RFE, USCIS requested additional evidence supporting the projected cost of AERC's project. In response to the RFE, the applicant submitted an updated business plan.

Pages 38—44 of the updated business plan provided hard and soft construction cost projections derived from RSMeans Square Footage Data for Hemet, CA. While it is an acceptable industry practice to utilize RSMeans data for estimating construction costs for general types of structures in general areas, and are generally useful in validating actual construction cost projections as being reasonable, RSMeans data are not appropriate for using as an estimate of costs for a specific project. Therefore, USCIS has determined that the use of construction budgets derived from RSMeans undermines the credibility of the projections presented in the business plan.

Furthermore, the RFE response included a construction contract from Allbest Construction Inc. (the "Contractor"), dated January 15, 2017. The contract identifies the Project location and scope, the planned construction duration, and the total expected amount to be paid to the Contractor. However, the contract

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<sup>2</sup> USCIS recognizes that each business is different and will require different information in its business plan. These guidelines, therefore, are not all-inclusive.

provides an amount payable to the Contractor that is identical to the RSMeans hard construction cost estimate for the Project which creates doubts with regards to the legitimacy of the contract. These doubts are further compounded by the fact that the contract does not contain basic terms that would seem necessary for establishing a contractual agreement for a project of this scope. Such basic terms may include but are not limited to how the funds will be spent, conditions for payment, a development timeline that includes dates, contingencies, or other features commonly associated with construction contracts. Therefore, the credibility of the business plan is further eroded as the applicant has not provided evidence that is specifically related to the cost of the project.

*Project Financing*

(b)(4)

In the RFE, USCIS requested evidence supporting the Project's projected sources of funds, including non-EB-5 funds and evidence of their secure commitment. Page 37 of the updated business plan identifies a loan as the source of [REDACTED] in capital financing for the Project, which is supported by a term sheet from Secured Capital Lending, dated February 27, 2017. However, the term sheet is unsigned by BVM, AERC, or any other entity or person involved in managing the Project. Therefore, USCIS is unable to determine if there is a secure commitment for the [REDACTED] in capital financing for undertaking the Project. Although USCIS is still unable to determine the actual total cost of the project because it is unclear in the updated business plan whether the land contribution is worth [REDACTED] or [REDACTED], the [REDACTED] continues to represent a sizeable portion of the capital necessary to develop the Project. The applicant has not provided evidence that supports a secure commitment from non-EB-5 investors (contracts, bonds, loans, letter of confirmation from the lender, other sources, etc.). Therefore, AERC has not demonstrated that the Project has advanced past the conceptual stage such that the requisite jobs will be created within the requisite timeframe.

**2. Translation(s) must comply with the requirements of 8 C.F.R. § 103.2(b)(3)**

The regulation at 8 C.F.R. § 103.2(b)(3) provides:

*Translations.* Any document containing a foreign language submitted to USCIS shall be accompanied by a full English language translation which the translator has certified as complete and accurate, and by the translator's certification that he or she is competent to translate from the foreign language into English.

**III. Conclusion**

8 C.F.R. § 103.2(b)(1) requires an applicant to "establish that he or she is eligible for the requested benefit." USCIS has determined that the record submitted does not establish eligibility for request(s) the Regional Center is seeking. Therefore, the Regional Center is afforded thirty (30) days from the date of this notice to submit additional information, evidence or arguments to support the application. Additionally, when USCIS serves a notice by mail, three (3) days are added to the prescribed period in

which to respond. Any such information, evidence or arguments will be considered before a decision is rendered. Failure to respond to this Notice of Intent to Deny may result in the denial of the Form I-924 based on the above stated reasons.

**NOTES:**

Please provide an index of any submitted evidence and include corresponding tabs for each section of evidence.